AR-42

TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING & TRADING
FACILITY RESPONSE PLAN FOR
ONSHORE STORAGE FACILITY

Submitted to

U S Environmental Protection Agency Region VI
Contingency Planning Section
P O Box 303
Dallas, TX 75201-9998

TRUMAN ARNOLD COMPANIES
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9547858

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1 0 INTRODUCTION

Truman Arnold Companies (TAC) of Texarkana Texas has prepared the following facility response plan for an onshore storage facility (OSF) This facility response plan has been prepared in accordance with the requirements of the Oil Pollution Act of 1990 (OPA 90) and the Federal Water Pollution Control Act (FWPCA) The regulations set forth by OPA and FWPCA require owners or operators of certain OSF facilities that handle store or transport oil and could possibly cause significant and substantial harm to the environment by discharging oil into the navigable or adjoining shorelines public drinking water intakes and environmentally sensitive areas to prepare submit and operate in compliance with an OSF response plan

The facility response plan presented here is applicable for the Arkansas Terminaling & Trading (AT&T) bulk petroleum storage and distribution terminal It has been determined that this facility has the potential to cause significant and substantial harm to the environment (as defined in 40 CFR 112 20(f)(ii)) due to an oil storage capacity of greater than 1 000 000 gallons and proximity to environmentally sensitive areas A certification of substantial harm determination form has been completed for this facility and is presented in Section 2 0

The information and procedures outlined in the document have been prepared on the basis of the best available information as of the date of printing It has been organized following the model plan for preparation of facility response plans as presented in 40 CFR Part 112 20 (h) As either changes in facility conditions occur due to new construction or changes in operations or when the scope of the EPA rules and regulations change TAC will revise and update the response plan

Except for the required notifications this response plan does not provide a how to approach That is it does not provide rigid step by step actions to be taken or procedures to be followed Experience shows that each spill is different calling for different responses The objectives of this plan are to

- Help terminal personnel prepare for a spill
- Ensure an effective and comprehensive response
- Prevent injury or damage to Company personnel the public and the environment
- Define existing procedures utilized to prevent spills
- Define alert and notification procedures to be followed when a spill occurs
- Document equipment personnel and other resources available to assist with spill response
- Establish a response team assign individuals to fill positions on the team and define the roles and responsibilities of team members
- Define organizational lines of responsibility to be followed during a response
- Outline response procedures and techniques for responding to a spill
- Satisfy the applicable requirements of the Oil Pollution Act 0f 1990

Nothing contained in this plan replaces good judgment or prudent operating practices

1 1 EMERGENCY RESPONSE ACTION PLAN

1 1 1 Qualified Individual Information

Qualified Individual (QI)	Rick Shingleur
Position	Environmental Manager
Address	701 S Robison Road Texarkana Texas 75501
Emergency	(903) 794 3835 (work) (b) (6) (home evening) (b) (6) (cell)
Qualified Individual (QIA)	Jay Kruckman
Position	Terminal Manager
Address	2207 Central Airport Road North Little Rock AR 72117
Emergency	(501) 945-4681 (work) (b) (6) (cell)

1 1 2 Emergency Notification Phone List

The prioritized identification of the TAC operations personnel by name location and telephone number are listed in Table 1 1 Table 1 1 prioritized the names and telephone numbers of TAC personnel that should be contacted immediately in the event of an emergency In the event of a spill the federal and state agencies listed on Table 1 2 must also be notified It may be necessary to call upon fire police and other public officials in the event of an emergency Emergency notification telephone lists of outside organizations are provided in Table 1 3 A compilation of all emergency contact information is provided in Appendix B (B 1 and B 3)

1 1 3 Spill Response Notification Form

An example spill response notification form is presented in Appendix C The information on this form will be collected filled out and communicated to the National Response Center and other appropriate agencies so pertinent information regarding a spill can be provided in a clear and concise manner All information on this form will be known or be in the process of being collected at the time of notification, however notification of the appropriate agencies will not be delayed to collect the information on this form

1 1 4 Response Equipment List and Location

TAC must rely primarily on outside contractors to provide manpower and equipment to make repairs and clean up products spilled due to an accident Lists of the approved contractors and vendors with general contract and service agreements designated to assist with emergencies and their emergency phone numbers are included in Appendix B 3

Because TAC relies on outside contractors for spill response activities only basic spill response equipment is maintained at the facility An inventory of available spill response equipment and storage locations are listed in Appendix B 2 Equipment such as fire extinguishers shovels absorbent booms and absorbent pads are available at the facility All absorbent materials and spill tools are stored in maintenance building which is identified on Figure 9 2 in Section 1 9

TABLE 1-1

INTERNAL NOTIFICATION INFORMATION

CONTACT NAME	TELEPHONE NUMBER
First Contacts	
Jay Kruckman Terminal Manager (QIA)	(Work) (501) 945-4681 (Cell) (b) (6)
Rick Shingleur Environmental Manager (QI)	(Work) (903) 794 3835 (Home) (b) (6) (Cell) (b) (6)
Terminal Personnel/Response Team	
Vince Contorno Operator	(Work) (501) 945-4681 (Home) (b) (6) (Cell) (b) (6)
John Jones Operator	(Work) (501) 945-4681 (Home) (b) (6)
Chris Antunes Operator	(Work) (501) 945-4681 (Cell) (b) (6)
Phillip Wilson Operator	(Work) (501) 945-4681 (Home) (b) (6) (Cell) (b) (6)
Denny Jagen Operator	(Work) (501) 945-4681 (Home) (b) (6) (Cell) (b) (6)
Ellis Hughes Operator	(Work) (501) 945-4681 (Cell) (b) (6)
Brandon Russell Operator	(Work) (501) 945-4681 (Cell) (b) (6)
Cindy Kumpe Office Manager	(Work) (501) 945-4681 (Home) (b) (6) (Cell) (b) (6)

TABLE 1-2

GOVERNMENT AND STATE AGENCIES NOTIFICATION

VERBAL NOTIFICATIONS

National Response Center	1 800-424 8802 (24 hr/day)
U S Environmental Protection Agency – Region 6 Emergency Response Center	(866) 372 7745
DPS Homeland Security Center	(501) 730 9750
Arkansas Department of Emergency Management (ADEM)	(800) 322-4012 (24 hr/day)
Arkansas Department of Environmental Quality – Emergency Response Section Dean VanDerhoff Emergency Response Coordinator	(800) 322-4012
City of North Little Rock Emergency Management Coordinator	(501) 340 5365

WRITTEN NOTIFICATIONS

Follow up written reports must be submitted to the agencies listed below as soon as practicable after the release

State Emergency Response Commission

Arkansas Department of Environmental Quality
Attn Emergency Response Coordinator
5301 Lakeshore Drive
North Little Rock, AR 72118 5317

TABLE 1-3

OUTSIDE ORGANIZATION EMERGENCY NOTIFICATION

Organization	Telephone Number
Fire Department	911
Fire Marshal	(501) 812 5942
Arkansas Department of Emergency Management	(800) 322-4012
State Police	(501) 618 8000
Local Police	911
Federal On Scene Coordinator	(866) 372 7745
North Little Rock LEPC Contact (Rick Ezell)	(501) 340 5365
Pulaski County LEPC Contact (Kathy Botsford)	(501) 340 6911
Little Rock LEPC Contact (Matt Burks)	(501) 918 3376
Local Water Supply System	Central Arkansas Water (501) 372 5161
Weather Report	National Weather Service (501) 834 0308 (8 00 to 5 00)
Local Television/Radio Station for Evacuation Notice	KATV Channel 7 Little Rock AR (501) 324 7777 KARK Channel 4 Little Rock AR (501) 340-4444
Hospitals	Baptist Health Medical Center – Springhill Dr (501) 202 3000
Spill Response/Cleanup Contractors	TAS Environmental (888) 654 0111 Agricultural Services Inc (ASI) (24 hr) (866) 274 2468 or (501) 490 2468 Pollution Management Inc (PMI) (501) 221 7122

1 1 5 Response Equipment Testing and Deployment

Because TAC relies on outside contractors for spill response activities only basic spill containment and clean up equipment is maintained at the facility Equipment such as shovels absorbent materials and fire extinguishers are available at the facility This equipment is inventoried and inspected on a quarterly basis The inventory and inspections are conducted to determine if a sufficient volume of equipment is maintained and the equipment is in operational order All operational personnel are trained in the use of the equipment that is maintained at the facility

In most spill situations at the facility the spill response contractor identified in the response plan would be contacted The spill response contractor is required by TAC to provide documentation on an annual basis that certifies they have performed inspections testing and deployment of their spill response equipment (Appendix B 3) At least once every three years AT&T will coordinate a deployment exercise with the OSRO to a response scenario associated with the facility

1 1 6 Facility Response Team

Arkansas Terminaling & Trading and TAC corporate personnel will make up the facility response team A brief description of the responsibilities of each member of the facility response team is outlined below A detailed description of team member responsibilities is outlined in Section 1 3 4

1 1 6 1 Corporate Officer

The President will be apprised of all emergency situations by the Terminal Manager and/or Environmental Manager The President and TAC corporate office in Texarkana Texas will ensure that all the support services necessary to safely eliminate potential dangers to public health or the environment are provided Mr Greg Arnold President/Chief Executive Officer has authorized implementation of any and all phases of this response plan

1 1 6 2 Corporate Environmental Manager (QI)

The Environmental Manager will assume overall direction of the departments/groups in the organization during the emergency He will ensure that the internal as well as external notifications are handled and he will provide requested information to the media Additionally the Environmental Manager will direct and decide the course of action to be taken for all of the emergency activities and will also be responsible for keeping the TAC s senior management apprised of the emergency situation

1 1 6 3 Terminal Manager (QIA)

The Terminal Manager will notify the Environmental Manager of all emergencies and give the initial and follow up vital information required for completing the spill response notification form and evaluate the situation to determine the personnel materials and equipment required to contain the discharge make repairs and clean up the spill area In addition the Terminal Manager will estimate the length of time that will be required to completely place the facility back in service The Terminal Manager will act as the Qualified Individual for spill response activities at least until the Environmental Manager (QI) arrives

1 1 6 4 Terminal Operations Staff

The Operations Staff are to provide support to the Terminal Manager These persons shall follow all instructions of the Terminal Manager The operations staff includes all Arkansas Terminaling & Trading facility personnel The response team will initiate support or completely implement the spill response

activities The degree of involvement from internal personnel will depend on the magnitude of the release

1 1 6 5 TAC Administrative Office

The Administrative Offices will provide support services if instructed to do so by either the Environmental Manager or the Terminal Manager

1 1 7 Evacuation Plan

This paragraph contains a condensed version of Arkansas Terminaling & Trading evacuation plan A complete version of the evacuation plan is located in Section 1 3 5 A map illustrating the Evacuation Routes follows this page and is also presented as Figure 9-4 in Section 1 9

In the event of an emergency all personnel (TAC and non TAC) located in the vicinity of the loading racks or the office are to proceed and exit through nearest main facility gate The three loading racks and the office are located in the immediately vicinity of at least one of the five main facility gates

TAC personnel and approved contractor personnel who are working in the tank farm areas are to follow the most direct unblocked route to one of the facilities main gates In the event that all routes leading to one of the main gates are blocked all personnel are to proceed to an area of the facility furthest from the hazard area If needed these personnel can cut or climb the security fence to exit the facility

All personnel who have successfully evacuated the facility are to assemble in the pecan tree field directly across Central Airport Road from the terminal office for a head count to insure complete evacuation of the facility If this field is still considered to be within the hazard area continue east on Rains Road to a safe distance The count will be conducted by the terminal manager or the ranking employee in the terminal manager s absence If the head count indicates that all personnel are not accounted for the facilities perimeter fence will be surveyed from the outside if possible to determine if personnel have not been able to exit through or over the fence

1 3 EMERGENCY RESPONSE INFORMATION

The information provided in this section describes procedures to be followed and equipment needed to respond to and mitigate an emergency involving the discharge of oil (gasoline diesel and jet fuel)

An emergency exists if a situation in which property or human life is in jeopardy and the prompt summoning of aid is essential Types of emergencies include but are not limited to tank and or pipeline ruptures or failures above and below ground leaks fires explosions flooding and spills If and when these situations arise then procedures for control notification containment repair and restoration shall be employed All of these actions shall be dictated and coordinated through TAC corporate and Arkansas Terminaling & Trading personnel

1 3 1 Notification

TAC is committed to maintaining the Arkansas Terminaling & Trading bulk petroleum storage and distribution terminal in a manner which will prevent the release of oil however when an emergency situation arises both internal notifications and external notifications will be required An internal chain of command as well as external support agencies has been identified to safeguard human health and the environment and comply with applicable state and federal reporting requirements

1 3 1 1 Internal Notification Procedures

The prioritized identification of the TAC operations personnel by name location and telephone number are listed in Table 1 1 and the responsibilities of these individuals are summarized below

1 Environmental Manager (QI) assume overall direction of emergency activities and keep the President and Corporate Office apprised of all emergency situation
2 Terminal Manager (QIA) first person notified of any emergency situation informs the Environmental Manager of the emergency situation and direct and decide the course of action to be taken for emergency activities
3 TAC President & Vice Presidents ensures that all the support services necessary to safely eliminate potential dangers to public health or the environment are provided

Detailed descriptions of the responsibilities of these individuals are presented in Section 1 3 4

1 3 1 2 Notification of Outside Parties

The Environmental Manager (QI) will be apprised of the emergency situation by the Terminal Manager The Environmental Manager or his designee will be responsible for notifying appropriate outside parties Emergency notification telephone lists are provided in Appendix B 1 These identify and prioritized the names and telephone number of outside organizations and personnel that need to be notified immediately in the event of an emergency

1 3 1 3 Government Agencies

In the event of a spill the federal and state agencies listed on Table 1 2 must be notified A site inspection will be conducted immediately to verify that a spill involving the Arkansas Terminaling & Trading facility has reached a waterway After the spill has been verified the appropriate governmental agencies (see Table 1 2) will be notified A waterway includes any dry stream bed dry wash intermittent stream running drainage ditch stream river stock pond flood control pond lake reservoir canal irrigation

ditch marsh swamp wetland tidal land inlet bay ocean ground water well water or similar water system

A Spill Response Notification Form is presented in Appendix C The information on this form will be collected filled out and communicated to the National Response Center and other appropriate agencies so pertinent information regarding a spill can be provided in a clear and concise manner All information on this form will be known or be in the process of being collected at the time of notification however notification of the appropriate agencies will not be delayed to collect the information on this form

1 3 1 4 Public Safety Officials

It may be necessary to call upon fire police and other public officials in the event of an emergency The Terminal Manager will call on the assistance of local public safety officials to minimize public exposure to the hazard evacuate the public control traffic assist in fire control and provide emergency medical care if necessary The telephone numbers of the local police fire hospital and other local state and federal agencies are provided in the Emergency Notification Phone List included in Appendix B 1

1 3 2 Response Equipment List

Because TAC relies on outside contractors for spill response activities only basic spill containment and clean up equipment is maintained at the facility An inventory of available spill containment and clean up equipment and storage location at Arkansas Terminaling & Trading facility are listed in Appendix B 2 Equipment such as fire extinguishers shovels and absorbent materials are available at the facility

1 3 3 Response Equipment Testing/Deployment Drills

TAC s spill containment and clean up equipment is inventoried and inspected on a quarterly basis The inspections are performed to insure that an adequate inventory is maintained and the equipment is in good condition Inspection/inventory dates and are provided in Appendix B 2

Because TAC does not have facility owned response equipment TAC requires that their outside spill response contractor provide certification that their spill response equipment is inspected tested and deployed on an annual basis A copy of this certification is provided in Appendix B 3 TAC also conducts deployment exercises, coordinated with their spill response contractor every three years Documentation of the deployment drill is provided in appendix H

1 3 4 Personnel

Facility personnel and contractor responsibilities in the event of a discharge or an emergency are outlined in Sections 1 3 4 1 through 1 3 4 7 Tables 3 1 3 2 and 3 3 on the following pages provide additional information concerning response personnel response contractors and response team

Table 3-1
EMERGENCY RESPONSE PERSONNEL
Company Personnel

Last Update April 2011

NAME	PHONE NUMBER	RESPONSE TIME	RESPONSIBILITIES	TRAINING
Rick Shingleur (QI)	(b) (6) (home) (903) 794 3835 (work) (b) (6) (cell)	150 minutes	Environmental Manager (Section 1 3 4 3)	HAZWOPER, Train the Trainer HAZWOPER, Supervisor/Manager SPCC/FRP Spill Response
Jay Kruckman (QIA)	(501) 945-4681 (work) (b) (6) (cell)	20 minutes	Terminal Operations	HAZWOPER, Refreshed Annually HAZWOPER, Train the Trainer HAZWOPER, Supervisor/Manager SPCC/FRP Spill Response
Vince Contorno	(b) (6) (home) (b) (6) (cell)	25 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
John Jones	(b) (6) (home)	45 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Chris Antunes	(b) (6) (cell)	15 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Phillip Wilson	(b) (6) (home) (cell)	45 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Denny Jagen	(home) (cell)	20 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Ellis Hughes	(cell)	50 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Brandon Russell	(cell)	15 minutes	Operations (Section 1 3 4 5)	HAZWOPER, Refreshed Annually HAZCOM SPCC/FRP Spill Response
Cindy Kumpe	(home) (cell)	35 minutes	Administrative (Section 1 3 4 6)	N/A

Table 3-2
EMERGENCY RESPONSE CONTRACTORS

Last Update April 2011

Contractor	Phone	Response Time	Contract Responsibility
TAS Environmental	(888) 654 0111	1 hour	Primary Spill Response Contractor
			Provide primary response personnel and equipment to contain and cleanup spills
			Vacuum truck services
			Disposal services
ASI – Little Rock ASI – Texarkana	(501) 490-2468 (24 hr) (800) 268-4790	1 hour 2 5 hour	Secondary Spill Response Contractor
			Provide primary response personnel and equipment to contain and cleanup spills
			Vacuum truck services
			Disposal services
Pollution Management Inc	(501) 221-7122	1 hour	Environmental Consultant
			Provide additional personnel and equipment in the event of a worse case emergency

Table 3-3
FACILITY RESPONSE TEAM

Last update April 2011

Team Member	Response Time (minutes)	Phone Numbers (day/evening)
Qualified Individual Rick Shingleur	150 minutes	Work - (903) 794-3835 Home - (b) (6) Cell – (b) (6)
Qualified Individual A Jay Kruckman	20 minutes	Work (501) 945-4681 Cell (b) (6)
Vince Contorno	25 minutes	Work - (501) 945-4681 Home - (b) (6) Cell - (b) (6)
John Jones	45 minutes	Work - (501) 945-4681 Home -
Chris Antunes	15 minutes	Work (501) 945-4681 Cell - (
Phillip Wilson	45 minutes	Work - (501) 945-4681 Home - Cell – (b) (6)
Denny Jagen	20 minutes	Work - (501) 945-4681 Home - Cell – (b) (6)
Ellis Hughes	50 minutes	Work (501) 945-4681 Cell - (
Brandon Russell	15 minutes	Work – (501) 945-4681 Cell –
Cindy Kumpe	35 minutes	Work – (501) 945-4681 Home - Cell – (b) (6)
Greg Arnold	N/A - Corporate Office	Work - (903) 794-3835
Jim Day	N/A - Corporate Office	Work - (903) 794-3835

1 3 4 1 Internal Spill Response Organization

Arkansas Terminaling & Trading and TAC corporate personnel will follow the operational response procedures as described in Section 1 7 to stop a discharge or potential discharge Concurrent with the stopping a discharge steps must be taken to contain the discharged product pick up the spill and restore the area to normal It will be necessary to remove the spilled product from the actual leak site before repairs can be made

The Terminal Manager (QIA) will evaluate the situation to determine the personnel materials and equipment required to contain the discharge make repairs and clean up the spill area In addition the Terminal Manager will estimate the length of time that will be required to complete the clean up and place the facility back in service The response team will initiate support or completely implement the spill response activities The degree of involvement from internal personnel will depend on the magnitude of the release Assuming the release can be handled by internal personnel the following sections describe the spill containment recovery and clean up procedures to be employed

1 3 4 2 Corporate Office

The President and Vice Presidents will be apprised of all emergency situations by the Environmental Manager (QI) or Terminal Manager (QIA) The TAC corporate office in Texarkana Texas will ensure that all the support services necessary to safely eliminate potential dangers to public health or the environment are provided Mr Greg Arnold President/CEO has authorized implementation of any and all phases of this response plan

1 3 4 3 Environmental Manager (QI)

The Environmental Manager will assume overall direction of the departments/groups in the organization during the emergency He will ensure that the internal as well as external notifications are handled and he will provide requested information to the media Additionally the Environmental Manager will direct and decide the course of action to be taken for all of the emergency activities coordinate the activities of all response contractors and will be responsible for keeping the President and Vice Presidents apprised of the emergency situation

In the event that the Environmental Manager is not available during an emergency situation the Terminal manager (QIA) will become the acting QI

1 3 4 4 Terminal Manger (QIA)

The Terminal Manager will notify the Environmental Manager of all emergencies and give the initial and follow up vital information Additionally the Terminal Manager will be responsible for the following

1 Determine the type of material discharged and estimate the volume released

2 Make immediate notification to the Environmental Manager

3 Act as liaison between the TAC corporate office and Arkansas Terminaling & Trading

4 Record response actions including dates and times on daily log Hard copies of reports should also be retained

5 Based upon the instruction of the Environmental Manager assist in clarifying the need for outside assistance and as necessary assist the Environmental Manager

The Terminal Manager will be responsible for organizing activation of the plan Specifically the Terminal Manager will be required to

1 Proceed to emergency site as soon as possible after notification
2 Keep the Environmental Manager informed of actions and progress
3 Assume full responsibility to handle the emergency safely and efficiently while safeguarding the public
4 Assist persons who are forced to evacuate
5 Arrange for closure of necessary valves
6 Arrange for necessary personnel equipment and tools to respond to the emergency
7 Assess need for outside help
8 Notify the Environmental Manager of the need to notify public safety officials in emergency area
9 Assist in traffic control to keep unauthorized personnel away from emergency area
10 Note adverse weather conditions which may affect the release material or the emergency response
11 Maintain communications at emergency site
12 Photograph action at site as necessary
13 Maintain a chronological record of events of actions taken for use in the post accident review
14 Repair and restore the emergency area to normal service
15 Remain at emergency site as necessary

1 3 4 5 Operations Staff

The Operations Staff are to provide support to the Terminal Manager These persons shall

FOLLOW ALL INSTRUCTION OF THE TERMINAL MANAGER

1 Shutdown slow down or perform other emergency procedures for abnormal operations as directed by onsite terminal manager
2 Coordinate decisions regarding opening or closing of valves etc
3 Secure additional equipment or personnel as needed to complete repairs and cleanup at emergency site

1 3 4 6 TAC Administrative Office

The Administrative Offices will provide support services if instructed to do so by either the Environmental Manager or the Terminal Manager including

1 Alerting and instructing personnel who are needed
2 Establishing communications with emergency area office
3 Designating persons authorized to make press releases

1 3 4 7 Outside Contractors

TAC must rely primarily on outside contractors to provide manpower and equipment to make repairs and clean up products spilled due to accident Lists of the approved contractors and vendors with general contract and service agreements designated to assist with emergencies are included in Appendix B 3 The authority designated by the Environmental Manager or the Terminal Manager shall contact the contracting firms to determine availability of personnel equipment current location and anticipated response time

Outside contractors will follow the instructions of all TAC staff shall perform the duties delegated by the Terminal Manager and/or Environmental Manager and will be the responsibility of the Terminal Manager and/or the Environmental Manager

1 3 5 Evacuation Plans

In the event of an emergency all personnel (TAC and non TAC) located in the vicinity of one of the loading racks or the office are to proceed and exit through nearest main facility gate The three loading load racks and the office are located in the immediately vicinity of one of the five main facility gates which exit to Central Airport Road and Highway 70 A map illustrating the evacuation routes for the facility is identified as Figure 9-4 is Section 1 9

TAC personnel and approved contractor personnel who are working in the tank farm areas are to follow the most direct unblocked route to one of the facilities main gates In the event that all routes leading to one of the main gates are blocked all personnel are to proceed to an area of the facility furthest from the hazard area If needed these personnel can cut or climb the security fence to exit the facility After exiting the perimeter fence these personnel should proceed if possible to the roll call locations identified below

All personnel who have successfully evacuated the facility are to assemble in the pecan tree field located directly across Central Airport Road from the terminal office for roll call to insure complete evacuation of the facility If the pecan tree field is considered to still be within the hazard area all personnel are to continue east on Rains Road to a safe distance from the hazard area The count will be conducted by the Terminal Manager or the ranking employee, in the Terminal Manager s absence If the count indicates that all personnel are not accounted for the facilities perimeter fence will be surveyed from the outside if possible to determine if personnel have not been able to exit through or over the fence

Once roll call has been completed cellular phones can be used for notification of all response personnel contractors and local/state/federal assistance At this point all personnel will be surveyed for injuries If injuries are identified medical personnel will be summoned to the site for transportation of injured personnel to a hospital If it is not feasible or safe to have medical personnel respond to the site then injured personnel will be loaded into personal vehicles and transported to the hospital It will be the responsibility of the Terminal Manager or his designee to ensure that Central Airport Road (from the south) remain clear to allow access of emergency medical personnel response personnel response contractors and local emergency personnel and equipment to the facility Emergency personnel will arrive to the facility via one of the main gates (see Figure 9-4)

The area in the vicinity of Arkansas Terminaling & Trading is populated with several residential and industrial properties all located within 500 yards of the facility If required evacuation of these properties will be coordinated with the Pulaski County and North Little Rock Emergency Planning Committee and the local fire departments

Other information that should be considered during an emergency evacuation include

1 Location of stored material

2 Potential hazards imposed by these materials if spilled

3 Spill flow direction and

4 Wind direction and speed

The northern portion of the facility contains seven aboveground storage tanks ranging in size from 10 000 to 80 000 barrels that contain gasoline diesel and jet fuel The southern portion of the facility contains four aboveground storage tanks ranging in size from 50 000 barrels to 80 000 barrels that contain gasoline diesel and ethanol The locations of these tanks are illustrated on Figure 9 2 in Section 1 9 and pertinent information concerning the tanks can be found in Table 4 1 in Section 1 4

The hazards imposed by a spill at this facility would be dictated by the type of material spilled the flow direction of the spilled material and the wind direction at the time of the spill The hazards associated with a gasoline diesel or jet fuel spill include chemical exposure fire and explosion A discussion of these hazards is provided in Section 1 4 Although the prevailing wind direction is from the south and west at variable speeds the wind direction at the time of the spill should be determined Wind direction may dictate the use of certain evacuation routes and procedures because the wind will move potentially explosive vapors in a certain direction

Although the terminal property is topographically flat a spill that breaches the tank containment area or a spill that occurs outside a containment area could ultimately reach Starks Bend Bayou This is especially true if the spill were to occur on the western third of the property If the spill were to occur on the eastern two thirds of the property the spill would likely collect in low lying areas on the property If the spill were to occur on the eastern two thirds of the property during a moderate to heavy rain event the spill could reach Starks Bend Bayou via drainage ditches along Central Airport Road and the railroad right of way adjacent to the northern property boundary Ultimately all drainage from the terminal property flows to Starks Bend Bayou Starks Bend Bayou reports to Faulkner Lake Site drainage information is illustrated on Figure 9 3 located in Section 1 9

The Local Emergency Planning Committee will be notified in the event of a spill and is responsible for activating the community Evacuation Plan if a community wide evacuation is deemed necessary by the Local Emergency Planning Committee

1 3 6 Qualified Individual s Duties

The responsibilities of the Qualified Individual (QI) which in the case Truman Arnold Companies is the Environmental Manager are identified below In order to expedite the response to a major spill/emergency the QI may delegate some of these responsibilities to the facility QIA

Responsibility of Qualified Individual

1 Activate internal alarms and hazard communication systems

2 Notify internal and external response personnel

3 Identify the character exact source amount and extent of the release

4 Notify and provide information to the appropriate Federal State and local authorities

5 Assess the interaction of spilled material with water and/or other substances stored at the facility and notify on scene response personnel of assessment

6 Assess possible hazards to human health and the environment

7 Assess and implement prompt removal actions

8 Access company funding to initiate cleanup activities and

9 Direct cleanup activities

1 4 HAZARD EVALUATION

1 4 1 Hazard Identification

The potential hazards associated with a release from the Arkansas Terminaling & Trading facility include the following

1 chemical exposure and

2 fire or explosion

The activities that will be performed under the guidance of this document will involve excavation characterization and handling of potentially hazardous materials Dust generated during site activities may also contain contaminants of concern In addition there is an increased potential for volatile organic vapors to be released from soils during emergency response activities Details regarding specific materials of concern the associated hazards and potential physical hazards are presented in the following sections

1 4 1 1 Hazards Related to Product Storage Handling and Facility Maintenance

The facility covered under this response plan has the potential for minor spills to occur during daily operations at storage tanks and truck loading or unloading stations Table 4 1 summarizes the hazard identification for storage tanks at the facility All tanks are aboveground tanks There are no underground tanks at the facility There are also no surface impoundments at the facility

Discharge scenarios are presented in Section 1 5 which describe the following in detail

- size of the discharge
- proximity to down gradient wells, waterways drinking water intakes
- proximity to fish and wildlife and sensitive environments
- likelihood that the discharge will travel offsite direction and slope (topography) of surface migration route
- Location of the material discharged
- available resources for remediation
- weather or aquatic conditions
- probability of chain reaction of failures and
- Direction of discharge pathway

1 4 1 2 Loading and Unloading of Transport Vehicles

At the loading racks load arms are use by the tank truck drivers to connect their trucks to the above ground storage tanks for loading gasoline diesel jet fuel or ethanol at this facility The potential exists for spills to occur as a result of loading head failure hose rupture or overfilling the trailer However tank truck drivers are required to stay with their trucks at all times during loading and unloading so only minor quantities are expected to be released at any one event Also each loading lane on all three

loading racks (total of eight lanes) is equipped with an emergency shutdown switch If any one of the emergency shutdown switches is activated all pumps serving fuel to all racks will shut down effectively shutting down all cargo truck loading

TABLE 4-1
HAZARD IDENTIFICATION – ABOVEGROUND TANKS

LAST UPDATED April 2011

Tank No	Substance Stored	Quantity Stored (gal)	Tank Type/Year	Maximum Shell Capacity (gal)	Normal Throughput (gal/day)	Failure/Cause
Tank 1	Diesel	1 036 938	IF/1980	1 111 908	72 630	None
Tank 2	Gasoline	1 874 334	IF/1980	1 996 050	172 670	None
Tank 3	Gasoline	1 875 300	IF/1980	1 997 016	172 755	None
Tank 4	Diesel	1 791 846	CR/1980	1 899 072	124 055	None
Tank 5	Gasoline	3 133 746	IF/1985	3 365 040	291 100	None
Tank 6	Jet A – Receiving Tank	1 755 852	IF/1995	1 799 532	87 800	None
Tank 7	Jet A – Day Tank	397 908	IF/1995	402 360	87 800	None
Tank 8	Gasoline	2 949 870	IF/2004	3 147 228	290 660	None
Tank 9	Diesel	2 950 458	IF/2004	3 155 040	219 500	None
Tank 10	Ethanol	2 048 493	SWS/2008	2 175 808	123 300	None
Tank 11	Gasoline	2 952489	SWS/2009	3 140 946	291 100	None
Tank 18	Biodiesel B 100	18 000	SWS/2007	20 000	165	None
Tank 19	Biodiesel B 100	18 000	SWS/2007	20 000	165	None
Tank 20	Ethanol Out Of Service	18 000	SWS/2008	20 000	0	None
Tank 21	Ethanol Out Of Service	18 000	SWS/2008	20 000	0	None
Tank 22	Ethanol Out Of Service	18 000	SWS/2008	20 000	0	None

IF = Internal Floating Roof CR = Cone Roof SWS = Single Wall Steel F = Fiberglass

1 4 1 3 Daily Operations

Daily operations including the replacement of valves and facility maintenance are expected to release some oil to the ground It is estimated that 1 to 50 gallons of oil would be released during such operations Pipeline receipts into a tank are another daily operation where a spill could occur If available tank space is miscalculated or a valve failure occurs a tank could be overfilled

1 4 1 4 Secondary Containment

All tanks at the facility are contained within secondary containment structures (earthen berms) correctly constructed to hold at least 110% of the largest tank inside the berm A diagram of the facility including the tanks and secondary containment structures is presented in Section 1 9 The north secondary containment (containing Tanks 1 2 3 4 5 6 and 7) has a capacity of 5 161 700 gallons and the south secondary containment (containing Tanks 8 9 10 11 18 19 20, 21 and 22) has a capacity of 5 749 000 gallons Each secondary containment is in excess of the 110% of the capacity of the largest storage tank requirement

1 4 1 5 Normal Daily Throughput

Normal daily throughput volumes are listed in Table 4 1 Emergency response procedures secondary containment and equipment have been designed to meet the potential worst case discharge

1 4 1 6 Fire and Explosion

The potential exists for fire and explosion to occur during an emergency response The creation of flammable vapors during excavation remediation or release activities could occur due to the presence of flammable or explosive atmospheric conditions If the level of flammable gases exceeds 20 percent of the lower explosive limit (LEL) then the excavation operations will be discontinued and personnel shall be removed from the area until the area is sufficiently ventilated to reduce the level of flammable gases

1 4 2 Vulnerability Analysis

All of the tanks are located in earthen berms providing at least 110% of the capacity of the largest tank within the berm The facility has two berm groups the North Berm containing Tanks 1 2 3 4 5 6 and 7 and the South Berm containing Tanks 8 9 10 11 18 19 20 21 and 22 In the event of a spill all spilled material would likely be contained within the berm In the unlikely event that the spill is not contained inside the berm the anticipated flow direction in the vicinity of the North Berm is to the west where it would flow as sheet flow to Stark Bend The anticipated flow direction in the vicinity of the South Berm is also to the west and would flow as sheet flow to Stark Bend Stark Bend is a lowland area and is considered a swamp and is located immediately adjacent to the west side of the terminal facility Starks Bend ultimately reports to an unnamed channel that extends approximately 1 3 miles southward to Faulkner Lake (see Figure 9 1) Planning distance is 24 miles and calculations are presented in Appendix F The vulnerability analysis is limited to hydraulically connected areas of Stark Bend and Faulkner Lake This area is referred to as the planning area

Water Intakes/ Public Water Supply The City of North Little Rock obtains its drinking water supply from Lake Maumelle and Lake Winona through underground pipelines Central Arkansas Water Supply confirmed that there are no water intakes in the planning area

Schools and Hospitals Meadow Park Elementary School is located approximately 3 000 feet to northwest of the terminal The nearest hospital Baptist Memorial Medical Center is located 7 miles west of the terminal There are no schools or hospitals within the planning area

Residential Areas There are approximately five or six residential homes located along the east side of the unnamed channel connecting Starks Bend and Faulkner Lake The closest home is approximately 250 feet from the channel The channel is intermittent and is usually dry with sections of pooled water

Businesses There are no businesses along the shore of the planning area

Wetlands The planning area is comprised largely of wetlands

Critical Habitats for Endangered and Threatened Species According to the U S Fish and Wildlife Service there are no threatened or endangered species present within the planning area

Fish and Wildlife According to the Arkansas Game and Fish Commission Stark Bend and Faulkner Lake are recreationally fished for the following fish inhabitants largemouth bass black and white crappie blue gill channel catfish blue catfish flathead catfish and white bass

Lakes and Streams The planning area is comprised of lakes and streams such as Stark Bend and Faulkner Lake

Endangered Flora and Fauna No endangered flora or fauna are identified within the planning area as confirmed by the U S Fish and Wildlife Service

Recreational Areas No recreational areas are identified within the planning area However according to the Arkansas Game & Fish Commission Faulkner Lake is used for recreational fishing

Transportation Routes (air, land and water) North Little Rock Municipal Airport is located approximately 10 miles northwest of the terminal and Adams Field Municipal Airport is located 5 miles southwest on the south side of the Arkansas River Interstate Highways 440 and 40 and State Highway 70 are all located within 1 mile of the terminal No water transportation routes in the planning area

Utilities Gas lines electrical lines and transmission lines are located in the vicinity of the terminal however these utilities should not be affected nor service disrupted as a result of a release from the terminal

1 4 3 Potential Spill Analysis

An industry standard method for the quantitative analysis of spill potential has not been established or proposed A quantitative probability analysis for a spill to occur at this facility is presented in Appendix D and summarized below Without further scientific research it is not known how accurately these probability estimates reflect actual probabilities nor do the probability estimates reflect the magnitude of a spill The probabilities listed in this section are solely for compliance purposes and represent numerical best guesses They should not be used for any other purpose

The probabilities represent the probability that a spill will occur The probability value and the definition of a spill in this context have no specified amount attached It is known that in the routine operation of a storage and transfer facility that small quantity spills routinely happen Thus the probability will not be zero

Quantitative values of spill potential have been derived using the following five criteria

1 tank age
2 spill history
3 horizontal range of a potential spill
4 vulnerability to natural disaster and
5 standard operational procedures

Using these criteria a matrix was developed and used to evaluate the spill potential at the facility The matrix and rational used to assign scores are presented in Appendix D

Of the criteria considered tank age spill history and operational procedures could produce a spill But factors such as a new tank no history of spill and sound operational procedures also can reduce the probability of a spill occurring Horizontal range of a potential spill vulnerability to natural disaster and standard operational procedures were used to increase and decrease the probability value to reflect the importance of an impact on human health and the environment

Calculations are presented in Appendix D The probability was calculated to be +0 16

1 4 4 Spill History

According to TAC personnel two spills have been recorded at the Site since operations began in 1980

Details of the two spills that have occurred to date are presented below

An overfill of diesel from Tank 1 occurred on June 28 1999 during a pipeline receipt Based on automated gauging prior to and after the spill and the volume of receipts and volume of shipments at the loading rack TAC estimated 36 992 gallons of diesel was discharged within the earthen containment area Product recovery from the containment area began immediately using on site equipment and an emergency response contractor was also mobilized for recovery of product Recovered product was transferred to Tank 4 Based on recovery volumes an estimated volume of 6 694 gallons of diesel was not accounted for after completion of response actions A monitored soil excavation and removal action was performed to remove hydrocarbon impacted soils Excavated soils (319 cubic yards) were disposed at a permitted off site landfill Regulatory agencies notified as a result of the release include the national response center ADEQ Emergency Response Division ADEQ Water Division and the North Little Rock Fire Department

An overfill of diesel from Tank 1 occurred in 1997 during a pipeline receipt An estimated volume of 500 gallons of diesel was discharged to the earthen containment area Product was recovered to the extent possible, and no soil was removed from the site as hydrocarbon impacted soils were land farmed within the containment area Regulatory agencies notified as a result of the release include the national response center ADEQ Emergency Response Division ADEQ Water Division and the North Little Rock Fire Department

Neither spill qualifies as a reportable spill as defined in 40 CFR part 110 As described in 40 CFR part 110 reportable oil spills are those that

Violate applicable water quality standards
Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines

1 5 DISCHARGE SCENARIOS

The following sections describe potential discharge scenarios for the Arkansas Terminaling & Trading facility

1 5 1 Small and Medium Discharge Scenarios

Discharge scenarios have been developed for this facility These scenarios describe the size of the potential discharge the direction and slope (topography) of migration pathways available resources for mitigation and remediation probability of a chain reaction of failures to occur and the proximity to downgradient wells waterways drinking water intakes and other environmentally sensitive areas A site location map a site plan diagram and a site drainage plan diagram are presented in Section 1 9 as Figures 9 1 9 2 and 9 3 respectively

Spills from overfilling tanker trucks line leaks valve leaks flange leaks oil/water separator overflow vehicle refueling or packing failure in pumps are situations which could potentially result in small or medium discharges A small discharge is considered less than 50 barrels (2 100 gallons) Migration of petroleum constituents from these spills may or may not be contained by secondary containment structures

Small spills that occur within the earthen berm including oil/water separator overflow line leaks packing or seal failure and tank water draw off operations under normal operating conditions would be less than 2 100 gallons and would be contained within the berm

A medium discharge is considered greater than 2 100 gallons and less than or equal to 36 000 gallons Tank overfills would most likely result in a medium discharge The berm is equipped with a gate valve which is kept closed during routine operation and is opened only to drain stormwater after it has been inspected However in the event that the spill is not contained within the berm due to gate valve failure or extenuating circumstances drainage flows westward and immediately into the Stark Bend wetland area (see Figure 9 3 in Section 1 9) which borders the west property boundary of the site

The three loading racks are contained by concrete curbing and roll over curbs which can contain the contents of the largest compartment of a tanker truck The floors of each lane of each loading rack (North Middle and South) slope toward drains that collect storm water and/or small/medium spills resulting from connecting and disconnecting hoses or minor overfill of tanker trucks to oil/water separators Spills in the North Loading Rack would discharge to the drains and to a sump located in the receipt manifold containment The sump is routed to the oil/water separator located in the north earthen containment berm Oil is separated and recycled to one of the bulk storage tanks However in the event of a spill of sufficient volume to overflow the roll over curb drainage would flow to the east to a drainage ditch that borders Central Airport Road on the eastern edge of the property Spills in the Middle and South Loading Racks would drain directly to oil/water separators located in the south earthen containment berm Oil is separated and recycled to one of the bulk storage tanks In the event of a spill of sufficient volume to overflow the roll over curbs of the Middle and South loading racks drainage would flow towards the drainage ditch that borders Central Airport Road on the eastern edge of the property

The receipt manifold is contained within a concrete containment structure with a 5 200 gallon capacity Gasket failure at the manifold could result in a potential spill of 4 200 gallons The concrete pond drains into the sump and to the oil/water separator as described above However in the event of extenuating circumstances which resulted in a spill of a magnitude which could not be contained within the manifold containment drainage would be to the south of the drainage ditch and ultimately to the Stark Bend wetland area

Spills outside the earthen berm in most cases would not travel far and would remain on soil gravel or concrete The slope of the site if relatively flat If a small or medium spill were to occur during a heavy rainstorm when the site is already covered with stormwater flowing off the site then the petroleum constituents could float on the stormwater and be transported with it into the storm water ditches which run along Central Airport Road or into site drainage ditches and into the Stark Bend wetlands area In the event of a small or medium spill of this nature soil remediation would be by landfarming onsite
The Stark Bend wetland area borders the facility on the western side The secondary containment drains directly into this wetland area The potential to impact the wetlands area is considered very high Additionally there is a residential area which boarders the facility to the north Drainage patterns at this facility indicate that the potential to impact the residential area is very low

The planning distance for emergency response for this facility is 24 miles There are no drinking water wells or industrial water wells located within the planning distance for this facility A potential discharge would be contained prior to impacting these types of wells Planning distance calculations are included in Appendix F

Because of the limited number of available facility personnel personnel are limited to responding to small discharges depending on the circumstances Containment and clean up equipment is maintained onsite that should be able to contain small and in some cases medium spill Equipment such as sorbents hand tools a small front end loader and fire extinguishers are maintained onsite A complete list of containment and clean up equipment is provided in Appendix B 2

1 5 2 Worst Case Discharge Scenario

The Worst Case Discharge volume has been calculated using the criteria set forth in 40 CFR Part 112 Appendix D Copies of the completed forms are presented in Appendix E of this document The Worst Case Discharge Volume is based on the capacity of the largest single aboveground storage tank The Worst Case Discharge volume was calculated as 3 365 040 gallons

The likelihood of a worse case discharge occurring as a result of loading and unloading operations facility maintenance operations piping sumps and vehicle refueling is slim The use of valves and other shutoff devices would ensure that discharges from these items would be kept to a minimum The only likely source for a worse case discharge would be from one of the aboveground storage tanks Valve failure at the tank or tank rupture would be the likely scenario for a worst case discharge If a valve failure at the tank or a tank rupture did occur the spill would discharge onto the ground (soil), but would be contained within the secondary containment In the event that the spill did breech the secondary containment either by splash over or by human error (i e facility personnel leaving a dike drain valve open by mistake) the spill would flow across the non contained portion of the facility as identified on the Site Drainage Plan Diagram (Figure 9 3) presented in Section 1 9 Flow of spilled fuel could be enhanced by weather conditions (i e storm water runoff from a rain event) If the spill reaches the perimeter of the facility it would discharge into Stark Bend Even though it is possible that enough product could flow offsite and follow this described flow path the probability of a worse case spill traveling offsite is low because of the very large secondary containment surrounding the tanks

The facilities tanks and operating equipment are maintained in good operating condition The above ground storage tanks are cleaned and internally inspected on a periodic basis During the internal inspections tank floors are inspected for corrosion pitting and cracks and all welded seams are inspected for integrity

There are no drinking water wells or industrial water wells located within the planning area for this facility A potential discharge would be contained prior to impacting these types of wells If a worse case discharge at the facility reaches Faulkner Lake it is possible that fish and wildlife could be

impacted The nearest wetland that could be impacted would be Stark Bend which is within the planning area for the facility

The above described worse case discharges would typically not result in a chain reaction failure because none of the tanks at the facility are manifolded (i e tank volumes are not equalized) therefore the probability of a chain reaction of failure for the tanks is low

Because of the limited number of available facility personnel personnel are limited to responding to small discharges depending on the circumstances Containment and clean up equipment is maintained onsite that should be able to contain small and in some cases medium spill In the event of a worse case discharge an oil spill response company would be contacted Equipment such as sorbents hand tools a small front end loader and fire extinguishers are maintained onsite A complete list of containment and clean up equipment is provided in Appendix B 2 The only factor identified that would affect response efforts would be weather An extremely heavy rainfall could make parts of the facility inaccessible and could cause spilled fuel to be more widely distributed

1 6 DISCHARGE DETECTION SYSTEMS

1 6 1 Discharge Detection by Personnel

Company personnel are onsite 24 hours per day to gauge and monitor all facility systems The following inspection procedures are conducted by terminal personnel during each 8 hour work shift

1 Read meters and check all loading rack equipment for leaks
2 Check for broken vapor hoses or skully cords
3 Read tank gauges and check tanks for visible leaks
4 Check tank valves to insure that they are in proper operating position
5 When closed ensure that all valves are locked
6 Check pumps and pump racks for leaks
7 Check that appropriate valves on off load rack are closed and locked
8 Check skully for proper operation while trucks are being loaded
9 Insure skully switch is returned to proper position after truck is loaded
10 Insure vapor burner is properly functioning

If facility personnel identify during an inspection that a discharge is taking place all personnel are to follow the response procedures identified in Sections 1 1 and 1 3 of this Facility Response Plan

1 6 2 Automated Monitoring System

Currently the only automated monitoring systems at the AT&T facility are tank overfill alarms for the bulk storage tanks located in the north containment area (Tanks 1 2 3 4 5 6 and 7) The tanks in the south containment do not have any type of automated monitoring system at this time The over fill alarm system on the north tank farm does not possess automatic shut off devices The alarm system is an audible type alarm Before the contents of the tank reach an overflow level an alarm will sound repeating the words Tank (#) High Level When this alarm sounds the flow is switched to another tank If another tank is not available Enterprise is notified to stop flow If the tank continues to fill a second alarm will sound repeating the words Tank (#) Max Fill When this alarm sounds Enterprise is again notified to stop flow and if flow continues it is switched to an alternate tank until flow is stopped The alarm will continue to repeat the warning until the system is reset

1 7 PLAN IMPLEMENTATION

1 7 1 Response Resources for Small, Medium, and Worst Case Spills

In the event of a small medium or worst case discharge the procedure outlined in Section 1 7 1 1 will be implemented

Small and Medium Case Discharges
In most cases small and medium discharges will be contained by secondary containment and topographic lows before significant migration can occur Contracted cleanup teams will be notified and respond to the discharge as needed to provide required resources

Small discharge response resources include

- Oil recovery devices with a daily recovery capacity equal to 2 100 gallons or more that are available at the facility within 2 hours of detection of a discharge
- Temporary oil storage capacity equal to 4 200 gallons/day or more

Medium discharge response resources include

- Oil recovery devices with a daily recovery volume equal to 18 000 gallons or more that are capable of arriving on scene within 12 hours
- Temporary oil storage capacity equal to 36 000 gallons/day or more

Due to the extensive vegetative nature of Stark Bend a boom is not an appropriate containment device TAC has chosen as an alternative to create an earthen dike comprised of dirt and fill material to contain a discharge

Worst Case Discharge

Worst case discharge response resources include

(1) On Water Recovery

The facility response plan for Arkansas Terminaling & Trading requires the calculation of Tier 1 Tier 2 and Tier 3 on water recovery resources at response times of 12 36 and 60 hours Response resource requirements are based on calculations for 40 CFR 112 Appendix E Attachment E 1 (see Appendix A) These values are summarized below

Response Level	Response Time (hours)	Response Resources On Water Recovery Capacity (bbls/day)	Response Resources Storage Capacity (bbls/day)
Tier 1	12	2 403	4 806
Tier 2	36	3 205	6 410
Tier 3	60	4 807	9 614

Based on these planning values TAC has contracted with TAS Environmental for the above recovery resources

(2) Shoreline Cleanup

The shoreline cleanup planning value is calculated at 8 012 barrels (see calculations in Appendix A) TAC has contracted with TAS Environmental to provide the required shoreline cleanup resources

1 7 1 1 Emergency Plans for Spill Response

Proper response actions to a wide range of spill scenarios are provided in Sections 1 7 2 through 1 7 5 Emergency plans for a spill response are presented in Sections 1 1 and 1 3 and the immediate action for an oil spill response is summarized in the Table 7 1 below The ability to implement the plan through proper training practice drills and facility inspections is described in Section 1 8 A list of additional experts and contracted help which can provide additional expertise and equipment is provided in Appendix B 3 Contractors providing additional storage vessels are also listed in Appendix B 3

Table 7-1
Oil Spill Response --- Immediate Actions

1 Stop the flow of product	**ACT QUICKLY** Secure pumps Secure dike drain valves Secure all other necessary valves etc
2 Warn Personnel	Enforce safety and security measures
3 Shut off ignition sources	Motors, including cars and trucks Electrical circuits Open flames, **including the Flare**
4 Initiate containment	Around the source of the spill
5 Notify Environmental Manager (QI)	(W) (903) 794 3835 (H) (903) 838-2471 Environmental Manager will provide further instructions If not available, refer to emergency contact phone list and contractors phone list
6 Notify National Response Center	1 800 424-8802

1 7 2 Disposal Plans

1 7 2 1 Recovered Product

Product picked up by vacuum truck operators will be disposed of at the facility contracted by the contractor temporarily stored in available storage tanks at the facility or temporarily stored in storage tanks provided by a contractor Product recovered by the vacuum truck and/or placed into temporary storage containers can be hauled to the terminal Clearance from the Terminal Manager or the Environmental Manager must be received before putting recovered product into a working terminal tank Any permits required for transporting or disposing of recovered fuel and or contaminated media (soil/water) will be the responsibility of the contractor

1 7 2 2 Contaminated Soils

Contaminated soils that are excavated will be stockpiled on plastic sheeting on site The stockpiled soils will be tested to determine whether or not they classify as hazardous Soils testing hazardous will be properly disposed Non hazardous soils will be aerated on site to acceptable hydrocarbon constituent levels and with approval of appropriate regulatory agencies will be spread on site or hauled to a landfill

1 7 2 3 Contaminated Equipment

All contaminated reusable equipment will be moved to the loading rack and steam cleaned Wash water will flow to the oil/water separator for treatment and will then be discharged

Contaminated personal protective equipment and sorbents will be placed into temporary storage containers such as 55 gallon drums and disposed of in accordance with applicable state and federal regulations

1 7 2 4 Decontamination Solution

All water resulting from steam cleaning of equipment will be treated using the existing oil/water separator (permitted under the NPDES) and discharged In the event that steam cleaning cannot be employed a low phosphate (alconox) wash will be conducted followed by a wash water rinse All wash/rinse water will be contained in 55 gallon drums and disposed of by a waste disposal contractor if required

1 7 3 Containment and Drainage Planning

1 7 3 1 Secondary Containment

Secondary containment for Tank 1 Tank 2 Tank 3 Tank-4 Tank 5 Tank 6 Tank 7 additive ASTs process water ASTs (PW Tanks 1 2 3 and 4) portions of the fuel transfer system and OWS 1 and 3 are provided by the northern earthen containment area (north containment) This containment area consists of an approximately 3 8 acre (interior toe of dike slope) area enclosed by an earthen dike with a minimum effective dike height of 4 8 feet Observation of the containment indicates that the earthen dikes are of sufficient quality and construction to contain a product spill from the largest tank without failure The containment volume of approximately 5 161 700 gallons is sufficient for containing 110% of the volume of Tank 5

The earthen containment located to the southwest (south containment) of the administrative offices provides secondary containment for Tank 8 Tank 9 Tank 10 Tank 11 additive ASTs two 20 000 gallon biodiesel tanks three 20 000 gallon ethanol tanks (out of service) process water ATs (PW Tank 6) portions of the fuel transfer system and OWS-4 and 5 This containment area consists of an

approximately 3 4 acre (interior toe of dike slope) area enclosed by an earthen dike with a minimum effective dike height of 6 0 feet Observation of the containment indicates that the earthen dikes are of sufficient quality and construction to contain a product spill from the largest tank without failure The containment volume of approximately 5 749 000 gallons is sufficient for containing 110% of the volume of Tank 8 Tank 9 or Tank 11

Secondary containment in the receipt manifold area located adjacent to the north loading rack is provided by two sources (1) a 2 2 foot high perimeter concrete secondary containment structure with a capacity of 11 700 gallons and (2) sumps within the containment area with an aggregate storage volume of approximately 1 000 gallons In addition the sumps in the receipt manifold containment area are equipped with automated float switches that activate transfer pumps that convey recovered fluids to either the bulk fuel ASTs or the process water ASTs depending on which sump collects the fluids

Secondary containment for the north loading rack area is provided by drainage control and related storage volume in the manifold area and process water ASTs A spill in this area would flow to the nearest drain inlet located at the center of each loading bay Fluids collected in these drains report to a 250 gallon sump (former U tube separator) in the receipt manifold area prior to being pumped to the two 12 000 gallon process water ASTs (PW Tanks 1 and 2) Collected fluids in PW Tank 1 and PW Tank 2 are manually released for treatment by OWS 1 prior to discharge to the stormwater holding area Recovered oil from the process is ultimately conveyed from the OWS back to one of the bulk fuel ASTs The system sumps and process water ASTs provide sufficient volume to capture the maximum capacity of any single compartment of tanker trucks loaded at the Site (8 500 gallons)

Secondary containment for the middle loading rack area is provided by drainage control and related storage volume provided by OWS-4 and ultimately the earthen containment area A spill in this area would flow to the nearest drain inlet located at the center of each loading bay Fluids collected in these drains report to OWS-4 prior to discharge to the stormwater holding area Recovered oil from the process is ultimately conveyed from the OWS back to one of the bulk fuel ASTs The drainage control system for the middle loading rack provides sufficient volume to capture the maximum capacity of any single compartment of tanker trucks loaded at the Site (8 500 gallons)

Secondary containment for the south loading rack area is provided by drainage control and related storage volume provided by OWS 5 and ultimately the earthen containment area A spill in this area would flow to the nearest drain inlet located at the center of each loading bay Fluids collected in these drains report to OWS 5 prior to discharge to the stormwater holding area Recovered oil from the process is ultimately conveyed from the OWS back to one of the bulk fuel ASTs The drainage control system for the south loading rack provides sufficient volume to capture the maximum capacity of any single compartment of tanker trucks loaded at the Site (8 500 gallons)

Unloading of additives from the delivery transport to the north additive ASTs occurs within an unloading area with perimeter concrete curbing which provides a secondary containment volume of approximately 2 000 gallons Although secondary containment for the entire contents of the largest additive transport unloading in this area is not required at this unloading area the containment capacity present in this area meets the requirements for loading/unloading areas as prescribed by 40 CFR 112 7(c)(1) The unloading containment area is not equipped with a discharge device however collected stormwater that does not exhibit a sheen is pumped into the earthen containment area If visible fuel or sheen is present on the water s surface sorbent materials should be used to remove the sheen prior to discharging the stormwater to the earthen containment

Unloading of fuel additives from the delivery transport to the south additive ASTs occurs in the western most lane of the Middle Loading Rack Containment of additives spills during off loading occurs as described in the middle loading rack containment description above

1 7 3 2 Site Drainage

A site drainage plan diagram illustrating the drainage area of each storm water outfall within the facility boundaries is presented as Figure 9 3 The site drainage map also illustrates the following details about this facility

1 Location of above ground liquid storage tanks

2 Location of the tanker truck loading racks

3 Location of the maintenance area

Existing structural control measures used to reduce pollutants in storm water include a diked area around the above ground storage tanks Gate valves on the dikes are used to control drainage from the diked areas Storm water contained within the diked area is visually inspected for oil and grease Any oil and grease is removed using an oil/water separator and sump prior to discharge Structural controls also include a cover over the tanker truck loading racks and gate valves on the drainage areas surrounding the loading rack and maintenance area

This facility has two identifiable stormwater outfalls (Outfalls 001 and 002) These outfalls are indicated on Figure 9 3 The ground surface surrounding the maintenance area office building and tanker truck loading racks consist primarily of concrete pavement Storm water drainage patterns are illustrated on Figure 9 3 The remainder of the site consists of vegetation/grass gravel and dirt The majority of the storm water flow from the site is sheet flow

Several features at this facility allow management of storm water run off These features include

1 Valves on the downgradient sides of the bermed areas containing the above ground storage tanks allowing for spill containment as well as inspection of storm water prior to discharge

2 Treatment of storm water from the loading rack areas area using an oil/water separator prior to discharge

3 A cover over the loading rack which minimizes storm water contact with areas associated with high impacts and

4 Placement of absorbent socks on storm water outfalls to remove oil and grease from storm water prior to discharging from the facility

1 7 4 Operational Response Procedures

Ideally the Terminal Manager will be the first to arrive at a reported emergency site However any employee may be designated to proceed immediately to the emergency location The first person that arrives onsite should

1 Scan the site to evaluate what occurred

2 If necessary evacuate people in the area

3 Isolate and eliminate all open sources of ignition and

4 Contact the Environmental Manager and inform him of the situation

In the event of discharge or emergency resulting from operational activities the actions to be taken by facility personnel involving tank or pipeline ruptures or leaks explosions fires or equipment failures are outlined in the following sections

1 7 4 1 Tank Overfills and Ruptures

In the event a tank overfills or ruptures due to equipment malfunction or personnel error an extremely hazardous condition may exist until the overflow or spillage is stopped and the spilled product picked up

Steps to be taken to control the spill area

1 Cut off the flow to the tank
   a) switch flow to other tankage if available and/or
   b) shut down the line

2 Check to be ensure dike drains are closed and holding

3 Notify police and fire department of spill and request assistance if necessary Have possible ignition sources shut off and control traffic to keep vehicles out of vapor area

4 If additional storage space is available drain tank to another tank until product no longer spills from tank

5 Arrange for vacuum trucks to pick up product from within the secondary containment dike
   a) If the product is condensate it may be advisable to cover product with mechanical foam to control vapors
   b) Equipment should be operated upwind of the pickup point
   c) If possible, hoses should be connected to dike drain This is the low point and product can be easily controlled with the drain valve

6 When product has been picked up flush the dike area with water to move potholes of product to drain area

7 Throughout the cleanup operation maintain a close check of the vapor spread to prevent possible ignition

8 Inspect tank for physical damage and arrange for repairs as necessary

1 7 4 2 Fire or Explosion

If there is a fire or explosion near the facility

1 Notify the nearest fire department

2 Determine if the facility will be endangered by fire

3 Advise fire fighters of hazardous materials stored in tankage and assist them in keeping flames away from facility

4 Notify Terminal Manager or Environmental Manager of possible emergency situation

If there is a fire or explosion involving the facility

DON'T TAKE CHANCES!

1 Notify the nearest fire department

2 Determine source of fuel feeding the fire and shut off the flow if it can be accomplished safely

3 Notify the Terminal Manager and the Environmental Manager of emergency situation

4 If fire is small use hand held or wheeled dry chemical fire extinguishers to control and extinguish the fire

5 Advise the professional fire fighters of other areas of concerns to be considered to keep the fire from spreading

6 Assist in keeping unauthorized personnel out of the emergency area

1 7 4 3 Abnormal Operations

"ABNORMAL OPERATIONS" refers to any condition of equipment or mode of operation which does not conform to the original design or subsequent revisions

1 7 4 4 Unintended Closure of Valves

1 If such action is likely to cause rupture then TAC personnel have been instructed to reverse the action immediately

2 When valve has returned to its original state TAC personnel have been instructed to immediately notify the Terminal Manager Do not leave the valve until you are assured that everything is back to normal

1 7 4 5 Other Component Malfunction or Human Error

Defective equipment or failure of components can produce conditions which are abnormal Abnormal conditions if not detected and corrected can quickly become emergencies

TAC personnel have been instructed that **NO** system shall be operated in a mode contrary to parameters outlined in the operations manuals without the full knowledge and approval of the Terminal Manager In the case of personnel error the hazard to persons or property will best be minimized by a frank honest admission and quick, appropriate correction of the erroneous action

1 7 4 6 Containment of Spills on Land

Natural avenues of migration for the released oil such as streams waterways ditches and natural gullies shall be followed on foot to determine whether the oil has impacted these avenues and/or how far the oil has migrated

If product is found then containment facilities shall be constructed A simple easily field constructed type of containment device is an earth dam A dam can be made by piling up earth with a bulldozer front end loader or other earth moving equipment Natural dry ditches can be blocked with compacted earth (dam) and used as a storage pond into which a spill can be directed Spills on paved or hard

(frozen) surfaces can be directed into such ditches or ponds with sandbag barriers The dams act to stop the controlled flow of product and create a pool for easier recovery

To prevent the infiltration of the released product into the subsurface or leaching into the ground water plastic sheeting or other non porous materials shall be used to line the dam

1 7 4 7 Containment of Spills in Shallow Water

Spill booms straw fences and or flume dams are types of spill containment devices that should be used to contain spills in shallow waters The type of containment selected will depend on the site specific conditions encountered and materials readily available

Spill booms may be used if the water is deep enough to allow free flow of water under the boom If used the boom shall be set at an angle to the flow of the stream and skimmer pits dug to catch the product as it moves downstream

A straw fence may be constructed using chicken wire or snow fence staked at an angle (never at a right angle) to the flow of the stream Straw bales should be broken into pieces about 2 feet square by 8 to 10 thick and stacked vertically This provides protection for a long time prevents loose oily straw from working downstream and facilitates changing oil saturated straw for fresh straw Such a straw fence should be built at an angle to the shore with a pit or sump at the shore to skim the oil

An underflow dam (or flume dam) may be built to contain the product or to protect against the further spread of the spill in the event of rain The dam diverts the water through a conduit of pipe (or pipes) places roughly parallel to the direction of the water flow The pipes are installed so that the upstream end is lower than the downstream end The stream is blocked by bulldozing earth across the pipes and packing the dirt down The pipes allow water to pass through the flume but retain the product behind the dam

1 7 4 8 Containment of Spills in Deep Water

One of the best methods of confining a spill on deep water is the use of a containment boom These may be of the commercial variety or made from poles logs or other types of floating devices

The placement of the boom on a flowing stream or river is critical The boom should be placed at an angle to the shore line to channel the product to shore The greater the velocity of the flow the greater the angle should be on the boom Under no circumstances should the boom be placed in a loop configuration This will channel the product to the center of the loop configuration and under the boom Skimmer pits should be dug at the downstream end of the boom to retrieve the product out of the channel

Spills on lakes should be surrounded by the boom or channeled into a bay to block it from spreading to larger areas

1 7 4 9 Recovery of Oil Layers Over 0 5 Inches Thick on Water

Product is more easily recovered when it is present in thicker quantities Portable skimmers can be used within the boom area to remove the oil from the water surface Vacuum trucks may be used at skimming pits or when product is not on water Caution should be used not to ignite vapors when using any type of powered pickup equipment Gasoline powered equipment is not recommended Air driven pumps should be used whenever possible

It may be necessary to pump the recovered product into temporary storage containers prior to hauling the oil to a terminal Clearance from the Terminal Manager and Environmental Manager should be received before putting the recovered product into a working terminal tank

1 7 4 10 Recovery of Oil Layers Less Than 0 5 Inches Thick on Water

As the product gets thinner on the water it becomes more difficult to pick up It can be moved by slowly moving the spill boom in toward shore or by tightening the circle when the spill is surrounded The product can also be moved by agitating with a fire hose

Eventually the layer of product on the water will be so thin that efforts to recover for commercial use will be impractical The use of sorbent agents such as Fiber Perl Petro Green and Spag Sorb should be used to pick up the residue This material is spread in a fairly thin layer upwind of the product and allowed to float into it As the product is further trapped more of the sorbent can be spread on top of the product The sorbent should be allowed to sit for a while to absorb as much oil as it can the then it should be raked into a skimmer pit and picked up These sorbents do not absorb water and do not readily release the oil Disposal of the sorbent material is discussed in Section 1 7 2

Final shoreline cleanup may involve applying emulsifying agents or implementing bioremediation techniques Prior to applying bioremediation techniques the approval from governmental agencies will be obtained

1 7 4 11 Recovery of Spills on Land

Product trapped in containment devices shall be sucked up by a vacuum truck and disposed of at the terminal or at the disposal facility that the vacuum truck operator has a contract Residual thin layers of oil can be cleaned up by using sorbents emulsifying agents or bioremediation techniques

1 7 5 Response Actions to Protect Environmentally Sensitive Areas

At such time as notice discovery or indication of a line break leak tank rupture or disaster the following procedures and precautionary measures shall be followed

1 7 5 1 Initial Action

1 Take necessary action to stop the flow of oil

2 Compile data and information on leak

3 Notify Terminal Manager who shall notify proper individuals as outlined

4 Responsible authority upon notification by the Terminal Manager shall determine location and extent of leak from preliminary information and shall accordingly dispatch other personnel Appropriate personnel will be dispatched to critical points as follows leak site and downstream locations on body of water

5 Notify outside parties as necessary

6 The Environmental Manager will further evaluate the situation determine need for further action and dispatch personnel and equipment as required to limit amount of the release

7 Contact one or more of the contracting firms for labor machinery and equipment to determine availability of personnel equipment current location and anticipated response time

1 7 5 2 Containment Recovery and Clean up of a Release

Containment recovery and clean up will be conducted according to the scope of the situation as evaluated by the Terminal Manager and/or Environmental Manager and in accordance with the procedures outlined in the previous sections of this document

1 7 5 3 Repairs

All repairs will be made in accordance with the demands of the immediate situation Initial and/or temporary repairs will be made to eliminate the leak and remove any potentially hazardous condition Permanent repairs will be made at such time as safe construction conditions can be assured and normal operation resumed

1 7 5 4 Reporting

Reports of releases shall be filed according to the requirements of state and federal environmental agencies and other governmental agencies having jurisdiction These agencies are listed in Table 1 2

A spill response notification form has been developed in accordance with 40 CFR Part 112 Appendix F An example is presented in Appendix C This report will be filled out by the Terminal Manager or his designate and provided to the Environmental Manager It will enable the reporter to present information in a clear and concise manner to the appropriate agencies however notification will not be delayed just to complete the form

1 8 SELF-INSPECTION, DRILLS/EXERCISES, RESPONSE TRAINING

1 8 1 Facility Self Inspection

Aboveground storage tanks (AST s) piping valves and secondary containment at the facility are visually inspected at least once per eight hour shift for obvious leaks by site personnel as they perform their routine duties Observations of spills and leaks maintenance and repair of structural controls will be recorded on a daily log an example of which is provided in Appendix G

1 8 1 1 Tank and Piping Inspection

In addition to daily and routine observations quarterly inspection of tanks piping pumps and valves will be made An example of the checklist to be used for this inspection is provided in Appendix G These records will be maintained for five years

1 8 1 2 Response Equipment Inspection

TAC s spill containment and clean up equipment is inventoried and inspected on a quarterly basis The inspection is performed to insure that the equipment is in good operational condition The checklist of items the response equipment will be inspected for are quantity on hand storage location accessibility operational status/condition and shelf life An example of the log to be used for this inspection is provided in Appendix G

Because TAC does not have facility owned response equipment TAC requires that their outside spill response contractor provide certification that their spill response equipment is inspected on an annual basis A copy of this certification is provided in Appendix B 3

1 8 1 3 Secondary Containment Inspection

In addition to daily and routine observations a quarterly inspection of structural controls including secondary containment will be made An example of the log to be used for this inspection is provided in Appendix G

1 8 2 Facility Drills/Exercises

In order to maintain the required level of preparedness for responding to any size/type of spill or emergency at the facility drills and exercises will be essential for all facility personnel Truman Arnold Companies has elected to adopt The National Preparedness for Response Exercise Program (PREP) to address the drill/exercise requirements for oil pollution response The drills/exercises required by PREP will be utilized as a continuous improvement tool for the facilities response system The drill/exercises to be utilized will include qualified individual notification drills spill management team tabletop drills and emergency procedures exercises Each of these drill/exercises is described below

1 8 2 1 Qualified Individual Notification Drill

The qualified individual notification drill is conducted to ensure that all lines of communication between the facility and the Qualified Individual are understood Each employee whose job responsibility may include contacting the Qualified Individual and provide spill/emergency information will be required to participate in this drill At the completion of the drill a log of the drill activities will be completed An example of the qualified individual notification log is presented in Appendix H The log will include an evaluation of the drill in order to determine if problems in the lines of communication are evident If the evaluation determines that communication problems exist then solutions to the problems will be

identified and a time table for the implementation of these solutions will be noted This drill will be conducted on a quarterly basis At least one qualified individual drill per year will be conducted during non business hours

The basic procedure for conducting a qualified individual drill will include the following

1) Facility personnel contacts QI by calling either home cell or office telephone numbers
2) If QI immediately responds the drill is documented using the appropriate form
3) If QI is not immediately responsive via home cell or office telephone numbers then QIA or QIB should immediately be contacted Leaving a message is not sufficient
4) If QIA or QIB responds document drill using the appropriate form
5) If appropriate continue to try to initiate contact with the QI

1 8 2 2 Spill Management Team Tabletop Exercise

The spill management team tabletop exercise will be used to rehearse the team s organization communication and decision making in managing a spill response The tabletop exercise will be used to review the team s knowledge of the contents and requirements of the Facility Response Plan Details reviewed during the exercise include but not limited to

1 Proper notification procedures

2 Communications system

3 Ability to access the Oil Spill Response Organization

4 Coordination of internal organization personnel with responsibility for spill response

5 Review of the transition from a local team to a regional team

6 Ability to effectively coordinate spill response activity with the National Response System infrastructure

7 Ability to access information in the Area Contingency Plan for location of sensitive areas resources available with in the area unique conditions of the area etc

At the completion of the exercise a log of the exercise activities will be completed An example of the Spill Management Team Tabletop Exercise log is presented in Appendix H The log will also include an evaluation of the exercise in order to determine if problem areas within the response plan or response training is evident If the evaluation determines that problems exist then solutions to the problems will be identified and a time table for the implementation of these solutions will be noted The facility will conduct a tabletop exercise at least once per year At least one tabletop exercise during a three year period will involve the simulation of a worse case discharge scenario The logs of these exercises will be maintained at the facility for five years

1 8 2 3 Emergency Procedures Exercise

The emergency procedures exercise will be used to rehearse the emergency procedures used to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from facility operational activities All facility personnel will be involved in this exercise so as to ensure personnel knowledge of

the actions to be taken to mitigate a spill At the completion of the exercise a log of the exercise activities will be completed An example of the Emergencies Procedures Exercise log is presented in Appendix H The log will include an evaluation of the exercise in order to determine if problems with personnel knowledge and awareness are evident If the evaluation determines that problems exist then solutions to the problems will be identified and a time table for the implementation of these solutions will be noted The logs will be maintained at the facility for five years The emergency procedures exercise will be conducted on a quarterly basis The emergency procedures exercise conducted unannounced can be used to fulfill the requirement for an annual unannounced exercise

1 8 2 4 Equipment Deployment Exercises

Because of the minimal operations personnel used to operate and maintain the facility TAC relies primarily on outside spill/emergency response contractors to provide the manpower and equipment needed to respond to spills that occur at the facility Basic spill response equipment is maintained at the facility as described in Appendix B 2 This equipment is inspected and tested on a quarterly basis and all facility operations personnel are trained in the use of this equipment The inspections and tests are performed to insure that an adequate inventory is maintained and the equipment is in good condition Personnel training is performed to ensure that all employees understand the function of the equipment and how it s deployed

Because TAC does not have the personnel or facility owned response equipment to conduct deployment exercises per PREP TAC requires that their OSRO provide annual certification that their spill response equipment is inspected tested and deployed on an annual basis The deployment exercise being certified by the OSRO would be required to be in an operating environment similar to the environment associated with a spill response related to the TAC facility This certification will be kept on file at the facility At least once every three years TAC will coordinate a deployment exercise with our OSRO to a response scenario associated with the facility Documentation of the deployment drill is provided in Appendix H

1 8 2 5 Unannounced Exercises

The unannounced exercise will be used to maintain the level of preparedness necessary to effectively respond to a spill At least once per year either the annual Spill Management Team Tabletop exercise or one of the quarterly Emergency Procedures exercises will be conducted unannounced The triennial Equipment Deployment exercise coordinated with the OSRO may also be conducted unannounced to satisfy the annual unannounced drill requirement

1 8 3 Response Training

The following operations require worker training unless the employer can demonstrate that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards

1 Emergency response for storage tank releases

2 Clean up operations required by governmental bodies whether federal state local or other involving hazardous substances that are conducted at uncontrolled hazardous waste sites

3 Corrective actions involving clean up operations at sites covered by Resource Conservation and Recovery Act of 1976 (RCRA)

4 Voluntary clean up operations at sites recognized by federal state local or other governmental bodies as uncontrolled hazardous waste sites

5 Operations involving hazardous wastes that are conducted at treatment storage and disposal (TSD) facilities regulated by 40 CFR 264 265 pursuant to RCRA or by Agencies under agreement with the EPA to implement RCRA regulations and

6 Emergency response operations for releases of or substantial threats of releases of hazardous substances without regard to the location of the hazard

1 8 3 1 Personnel Response Training

Supervisors shall maintain a thorough knowledge of all procedures for which they are responsible to insure compliance

A continuing training program shall be conducted to instruct operating and maintenance personnel to

1 Carry out the operating and maintenance and emergency procedures that relate to their assignments
2 Know the characteristics and hazards of the commodities transported
3 Recognize conditions that are likely to cause emergencies predict the consequences of facility malfunction or failures and commodity spills and take appropriate corrective actions
4 Take steps necessary to control an accidental release of commodity to minimize the potential for fire explosion toxicity or environmental damage
5 Learn the proper use of firefighting procedures using available equipment and personal protective equipment by utilizing where feasible a simulated emergency condition
6 Safely repair facilities using special precautions such as isolation and purging when highly volatile liquids are involved (maintenance personnel)

Training is to be conducted on a regular and continuing bases

Each quarter all personnel will conduct the following exercises/drills

1 Communications/Notification Drill and

2 Emergency Procedures Exercise

On a semi annual basis supervisors will review with personnel their performance in meeting the objectives of the training program and make appropriate changes to the training program as necessary to insure that it is effective

All training classes reviews and drill/exercises will be documented on a training log An example of the training log is presented in Appendix I

1 8 3 2 Discharge Prevention/Safety Meetings

On a monthly basis the facility will hold a Discharge Prevention/Safety Meeting During each meeting a specific topic concerning discharge prevention and a specific topic concerning safety will be discussed in detail A log documenting the date discussion topics and personnel present will be maintained An example of this log is presented in Appendix I

1 9 DIAGRAMS

This section contains the facility diagrams which include a general site location map (Figure 9 1) a site map (Figure 9 2) a site drainage map (Figure 9 3) evacuation routes map (Figure 9-4) and a facility tank and tank/piping schematic (Figure 9 5A/9 5B)

1 10 SECURITY

The facility is secured and protected from road access by a chain link fence with card access traffic gates and facility personnel are present on site 24 hours a day seven days a week Locations of fencing and gates are indicated on the facility diagrams presented in Section 1 9 Facility lighting is installed to ensure spills occurring during hours of darkness are discovered There are seven emergency cut offs at the facility Two emergency cut offs are located at each loading rack and one emergency cut off is located in the office building All valves and pumps are chained and locked including the berm drainage valves

2 0 RESPONSE PLAN COVER SHEET

Owner/Operator of Facility ***Truman Arnold Companies***

Facility Name ***Arkansas Terminaling & Trading***

Facility Address (street address or route) ***2207 Central Airport Road***

City State and U S Zip Code ***North Little Rock, Arkansas 72117***

Facility Phone Number ***(501) 945-4681***

Latitude (Degrees North)
34° 46 18 80 N
degrees minutes seconds

Longitude (Degrees West)
92° 10 41 89 W
degrees minutes seconds

Dun & Bradstreet Number
751289172

North American Industrial Classification System (NAICS) Code
42271

Largest Aboveground Oil Storage Tank Capacity (Gallons)
3,365,040

Maximum Oil Storage Capacity (Gallons)
24,585,748

Number of Aboveground Oil Storage Tanks
16

Worst Case Oil Discharge Amount (Gallons)
3,365,040

Facility Distance to Navigable Water Mark the appropriate line

0 – ¼ mile X ¼ ½ mile ___ ½ 1 miles____ >1 mile___

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM
Adapted from 40 CFR, part 112, Appendix C, Attachment C-II

Facility Name Arkansas Terminaling & Trading

Facility Address 2207 Central Airport Road North Little Rock, Arkansas 72117

1 Does the facility have maximum storage capacity greater than or equal to 42 000 gallons *and* do the operations include over water transfers or oil to or from vessels?
Yes **No X**

2 Does the facility have maximum storage capacity greater than or equal to one million (1 000 000) gallons *and* is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?
Yes **No X**

3 Does the facility have a maximum storage capacity greater than or equal to one million (1 000 000) gallons *and* is the facility located at a distance (as calculated using the appropriate formula in Attachment C III or an alternative formula[1] considered acceptable by the RA) such that a discharge from the facility could cause injury to an environmentally sensitive area as defined in Appendix D?
Yes X No

4 Does the facility have a maximum storage capacity greater than or equal to one million (1 000 000) gallons *and* is the facility located at a distance (as calculated using the appropriate formula in Attachment C III or an alternative formula[1] considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?
Yes **No X**

5 Does the facility have a maximum storage capacity greater than or equal to one million (1 000 000) gallons *and* within the past 5 years has the facility experienced a reportable spill in an amount greater than or equal to 10 000 gallons?
Yes **No X**

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true and complete

Signature

Rick Shingleur
Name (please type or print)

Environmental Manager
Title

April 2011
Date

[1] If an alternative formula is used documentation of the reliability and analytical soundness of the alternative formula must be attached to this form

3 0 ACRONYM

ACP	Area Contingency Plan
ASTM	American Society of Testing Materials
API	American Petroleum Institute
AST	Aboveground storage tank
bbls	barrel(s) = 42 gallons
bpd	barrels per day
bph	barrels per hour
CHRIS	Chemical Hazards Response Information Systems
CWA	Clean Water Act
DOI	Department of Interior
DOC	Department of Commerce
DOT	Department of Transportation
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FR	Federal Register
FWPCA	Federal Water Pollution Control Act
gal	gallons
gpm	gallons per minute
HAZMAT	Hazardous Materials
HAZWOPER	Health and Safety for Hazardous Waste Operations
LEPC	Local Emergency Planning Committee
MMS	Minerals Management Service (part of DOI)
mg/kg	milligrams per kilogram
NCP	National Contingency Plan

Acronyms (Continued)

NOAA	National Oceanic and Atmospheric Administration (part of DOC)
NRC	National Response Center
NRT	National Response Team
OPA	Oil Pollution Act of 1990
OSC	On Scene Coordinator
OSF	Onshore storage facility
OSHA	Occupation Safety and Health Administration
ppm	parts per million
PREP	National Preparedness for Response Exercise Program
PSD	Prevention of Significant Deterioration
RA	Regional Administrator
RCRA	Resource Conservation Recovery Act
RRC	Regional Response Center
RRT	Regional Response Team
RSPA	Research and Special Programs Administration
SARA	Superfund Amendment Reauthorization Act
SERC	State Emergency Response Commission
SDWA	Safe Drinking Water Act of 1986
SI	Surface Impoundment
SIC	Standard Industrial Classification
SPCC	Spill Prevention Control and Countermeasures
TAC	Truman Arnold Companies
TSD	Treatment Storage and Disposal
USCG	United States Coast Guard

4 0 REFERENCES

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The National Response Team 1990 Oil Spill Contingency Planning National Status A Report to the President Washington D C U S Government Printing Office

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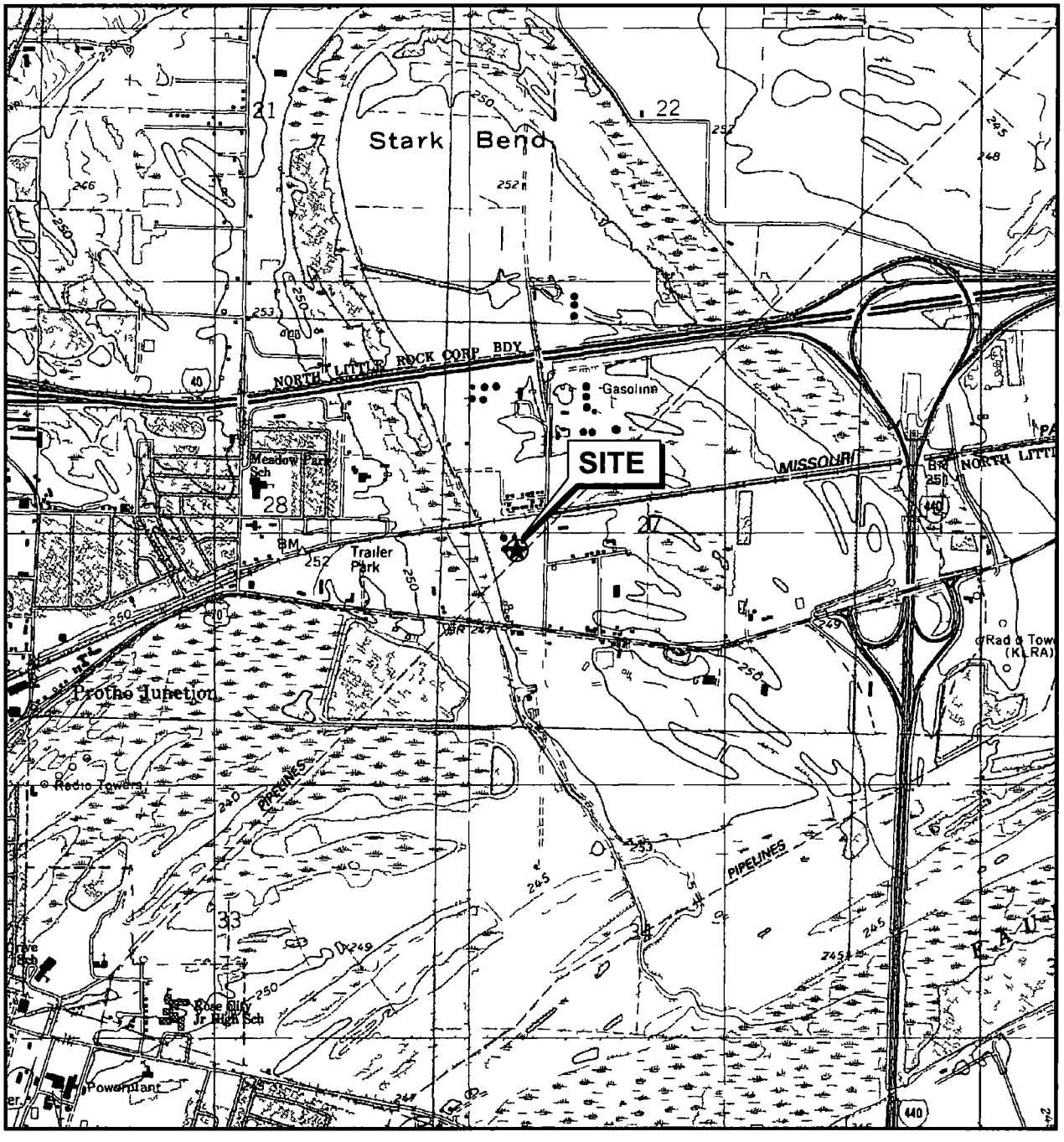
U S DOT FEMA and U S EPA Handbook of Chemical Hazard Analysis Procedures

U S DOT FEMA and U S EPA Technical Guidance for Hazard Analysis Emergency Planning for Extremely Hazardous Substances

FIGURES



Contour Interval 10 Feet

ARKANSAS

QUADRANGLE LOCATION

N

Scale in Feet

0 1000 2000

Source

Base map from McAlmont AR 7 5 min USGS quadrangle dated 1986

TRUMAN ARNOLD COMPANIES

ARKANSAS TERMINALING AND TRADING

Figure 9 1

SITE LOCATION MAP

PROJECT 2028	BY AJD	REVISIONS
DATE JUNE 2011	CHECKED BDT	

PASTOR BEHLING & WHEELER LLC

CONSULTING ENGINEERS AND SCIENTISTS

EXPLANATION

- Gasoline Line
- Diesel Line
- Ethanol Line
- Jet Fuel Line
- Gasoline Transfer Line

N

Scale in Feet

0 50 100

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

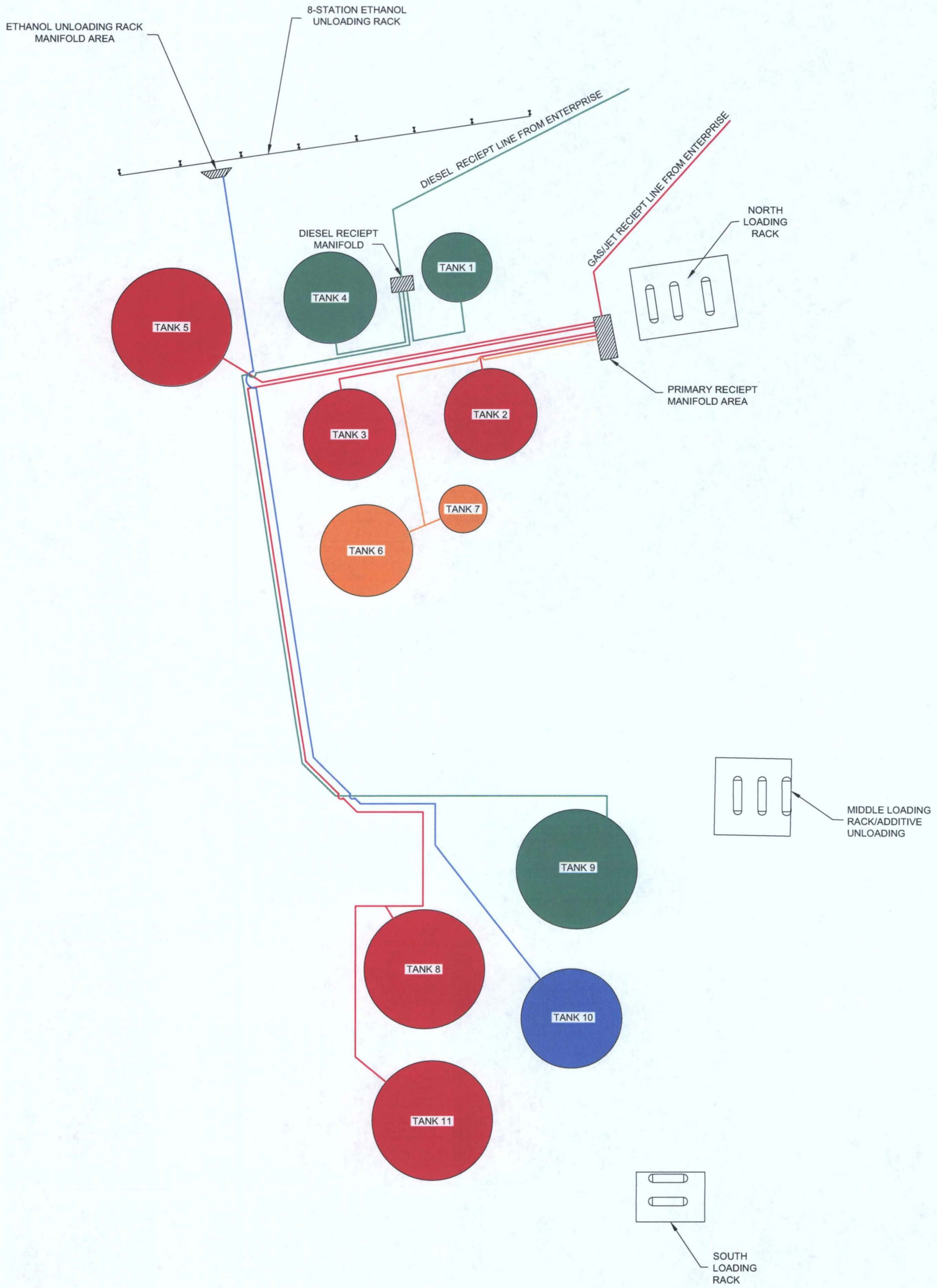
TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-5B

DRAW LINE SCHEMATIC

PROJECT: 2028	BY: AJD	REVISIONS
DATE: JUNE, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS



EXPLANATION

- Gasoline Line
- Diesel Line
- Ethanol Line
- Jet Fuel Line

N

Scale in Feet

0 50 100

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

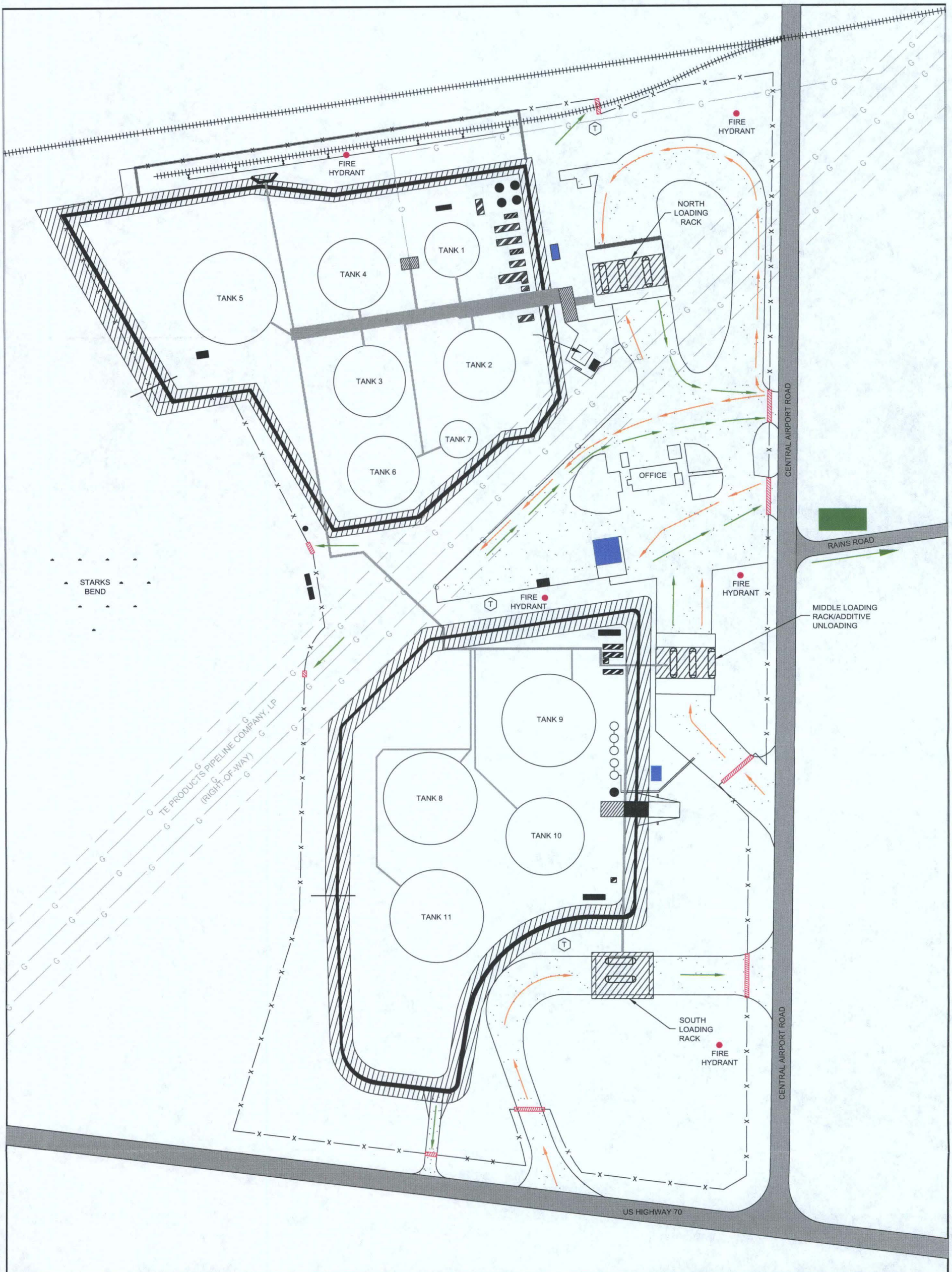
TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-5A

RECEIPT LINE SCHEMATIC

PROJECT: 2028	BY: AJD	REVISIONS
DATE: JUNE, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS



EXPLANATION

- Earthen Containment Berm
- Concrete Pavement
- Aboveground Pipe Support Rack
- Additive AST
- Canopy Covered Area
- Electrical Transformer
- Chain Link Fence
- Gated Access
- Evacuation Route / Response Personnel Egress
- Response Equipment Transportation Route / Response Personnel Ingress
- Evacuation Re-grouping Area
- Containment & Clean-up Equipment Storage Location

N

Scale in Feet: 0 60 120

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

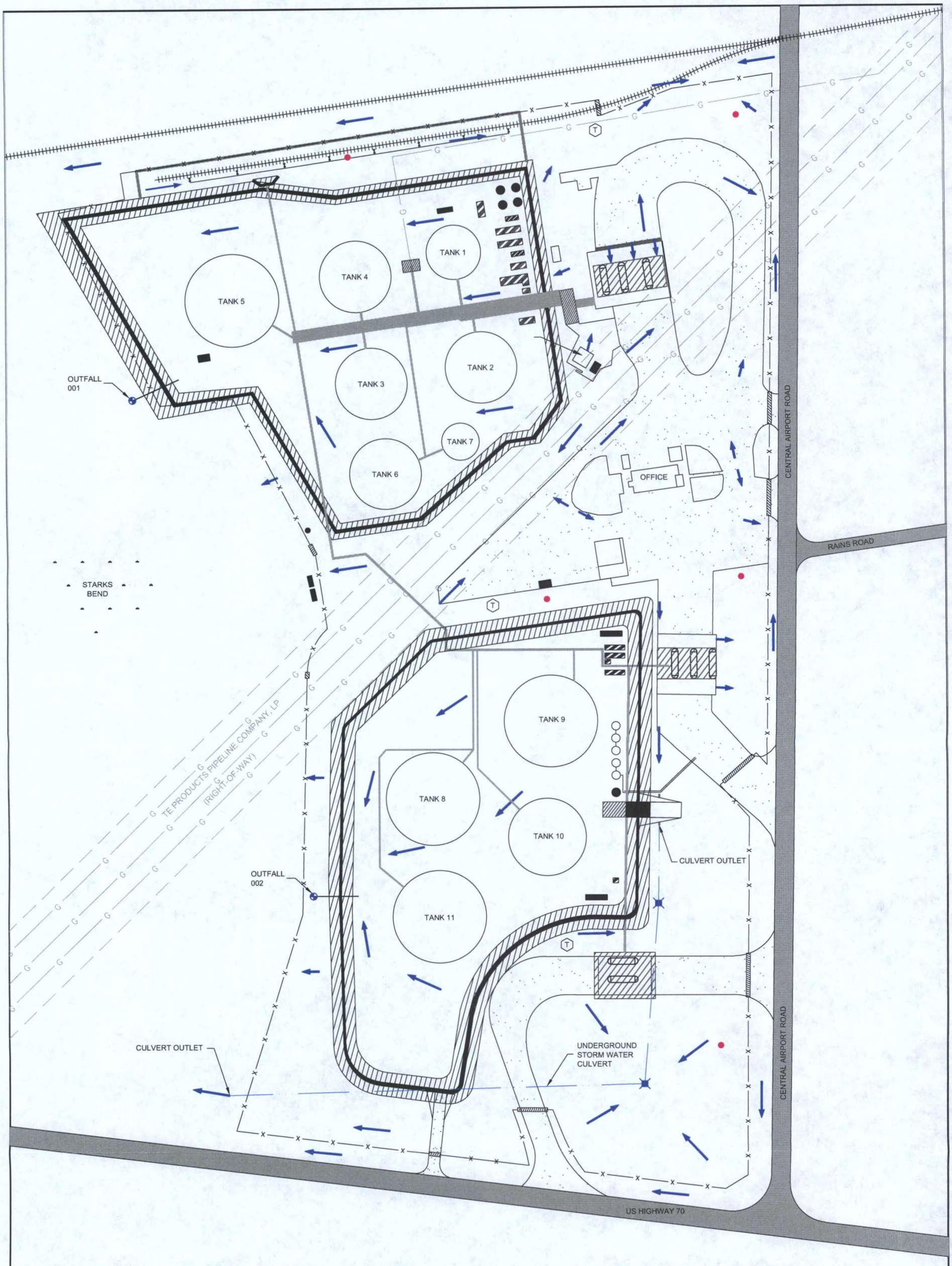
TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-4

SITE EVACUATION PLAN DIAGRAM

PROJECT: 2028	BY: AJD	REVISIONS
DATE: JUNE, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS



EXPLANATION

- Earthen Containment Berm
- Concrete Pavement
- Aboveground Pipe Support Rack
- Additive AST
- Canopy Covered Area
- Electrical Transformer
- Fire Hydrant
- Chain Link Fence
- Gated Access
- Surface Water Flow Direction
- Drain Inlet

N

Scale in Feet

0 60 120

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

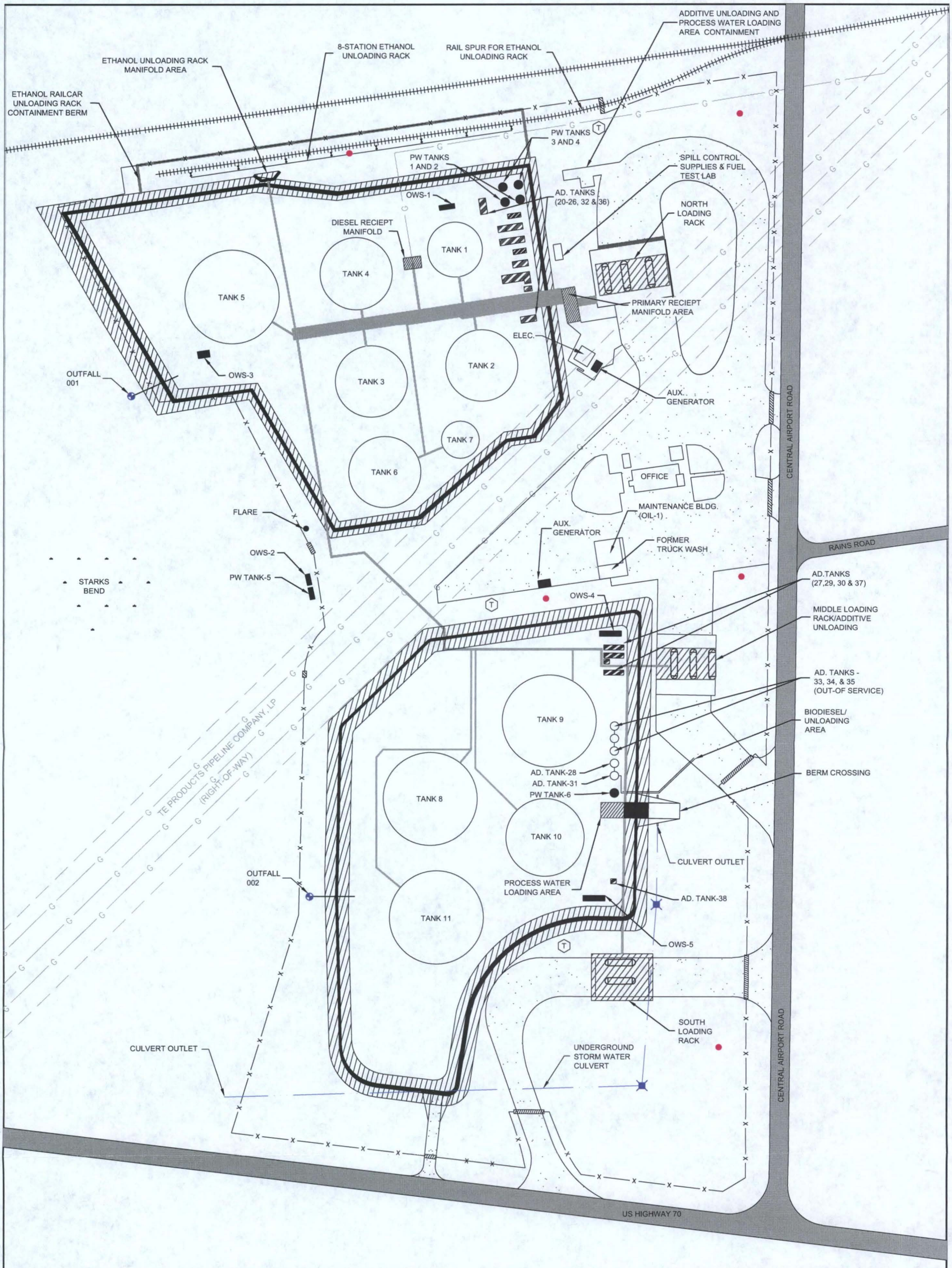
TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-3

SITE DRAINAGE PLAN DIAGRAM

PROJECT: 2028	BY: AJD	REVISIONS
DATE: JUNE, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS



EXPLANATION

- Earthen Containment Berm
- Concrete Pavement
- Aboveground Pipe Support Rack
- Additive AST
- Canopy Covered Area
- Electrical Transformer (T)
- Fire Hydrant
- Chain Link Fence
- Gated Access
- Drain Inlet

N

Scale in Feet

0 60 120

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

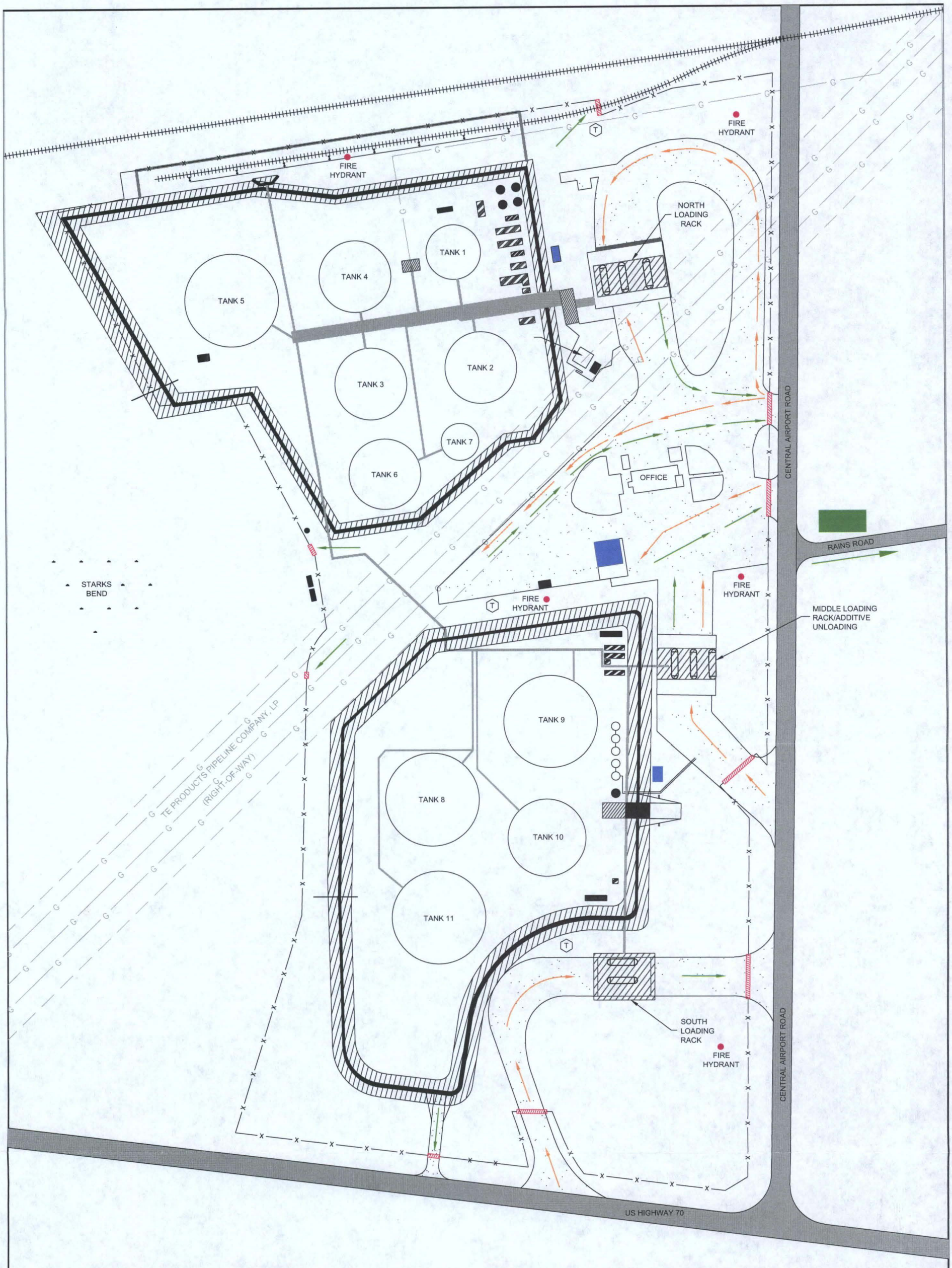
TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-2

SITE PLAN DIAGRAM

PROJECT: 2028	BY: AJD	REVISIONS
DATE: MAY, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS



EXPLANATION

- Earthen Containment Berm
- Concrete Pavement
- Aboveground Pipe Support Rack
- Additive AST
- Canopy Covered Area
- Electrical Transformer (T)
- Chain Link Fence
- Gated Access
- Evacuation Route / Response Personnel Egress
- Response Equipment Transportation Route / Response Personnel Ingress
- Evacuation Re-grouping Area
- Containment & Clean-up Equipment Storage Location

N

Scale in Feet: 0 60 120

Source:
Basemap taken from Ridge & Associates, Inc. Arkansas Terminaling and Trading "Overall Plot Plan".
Monitoring well locations and perimeter fence based on field measurements.

TRUMAN ARNOLD COMPANIES
ARKANSAS TERMINALING AND TRADING

Figure 9-4

SITE EVACUATION PLAN DIAGRAM

PROJECT: 2028	BY: AJD	REVISIONS
DATE: JUNE, 2011	CHECKED: BDT	

PASTOR, BEHLING & WHEELER, LLC.
CONSULTING ENGINEERS AND SCIENTISTS

APPENDIX A

WORKSHEET TO PLAN VOLUME OF RESPONSE RESOURCES FOR WORST CASE DISCHARGE

WORKSHEET TO PLAN VOLUME OF RESPONSE RESOURCES
FOR WORST CASE DISCHARGE
40 CFR 112 20
ATTACHMENT E I

Truman Arnold Companies – Arkansas Terminaling & Trading

Part I Background Information

Step (A) Calculate Worst Case Discharge in barrels (Appendix D) | 80 120

Step (B) Oil Group (Table 3 and Section 1 2 of this Appendix) | 1 0

Step (C) Operating Area
(choose one) ☐ Nearshore/Inland Great Lakes ☒ or River and Canals

Step (D) Percentages of Oil (Table 2 of this Appendix)

Percent Lost to Natural Dissipation	Percent Recovered Floating Oil	Percent Oil Onshore
80	10	10
(D 1)	(D2)	(D3)

Step (E1) On Water Oil Recovery: Step (D2) x Step (A) / 100 = 8 012 (E1)

Step (E2) Shoreline Recovery: Step (D3) x Step (A) / 100 = 8 012 (E2)

Step (F) Emulsification Factor (Table 3 of this Appendix) | 1 0 (F)

Step (G) On Water Oil Recovery Resource Mobilization Factor
(Table 4 of this appendix)

Tier 1	Tier 2	Tier 3
0 30	0 40	0 60
(GI)	(G2)	(G3)

Part II On Water Oil Recovery Capacity (barrels/day)

Tier 1	Tier 2	Tier 3
2 403	3 205	4 807
Step(E1) x Step(F) x Step(G1)	Step(E1) x Step(F) x Step(G2)	Step(E1) x Step(F) x Step(G3)

Part III Shoreline Clean up Volume (barrels/day) | 8 012 Step(E2) x Step(F)

Part IV On Water Response Capacity by Operating Area
(Table 5 of this Appendix)
(Amount needed to be contracted for in barrels/day)

Tier 1	Tier 2	Tier 3
1 875	3 750	7 500
(J1)	(J2)	(J3)

Part V On Water Amount Needed to be Identified, but not Contracted for in Advance (barrels/day)

Tier 1	Tier 2	Tier 3
528	0	0
Part II Tier 1 Step (J1)	Part II Tier 2 Step (J2)	Part II Tier 3 Step (J3)

NOTES
To convert from barrels/day to gallons/day multiply the quantities in Parts II through V by 42 gallons/barrel

A facility that handles stores or transports multiple groups of oil must do separate calculations for each oil group on site except for those oil groups that constitute 10 percent or less by volume of the total oil storage capacity at the facility For purposes of this calculation the volumes of all products in an oil group must be summed to determine the percentage of the facility s total oil storage capacity

APPENDIX B

EMERGENCY RESPONSE INFORMATION

APPENDIX B-1

EMERGENCY NOTIFICATION TELEPHONE LIST

ARKANSAS TERMINALING & TRADING

EMERGENCY NOTIFICATION TELEPHONE LIST

Organization	Telephone Number
National Response Center	1 800-424 8802 (24 hr/day)
Qualified Individual (QI) Emergency Response Coordinator Rick Shingleur Environmental Manager	(903) 794 3835 (Work) (b) (6) (Home) (Cell)
Terminal Manager (QIA) Jay Kruckman	(501) 945-4681 (Work) (b) (6) (Cell)
Terminal Response Personnel Vince Contorno John Jones Chris Antunes Phillip Wilson Denny Jagen Ellis Hughes Brandon Russell Cindy Kumpe	(501) 945-4681 (Work) (b) (6) (Home) (Home) (Cell) (Cell) (Cell) (Cell) (Cell) (Home)
Federal On Scene Coordinator	(866) 372 7745 (24 hr/day)
Fire Department	911
ADEQ – Emergency Response Section	(800) 322-4012
AR Dept of Emergency Management	(800) 322-4012 (24 hr/day)
State Police	(501) 618 8000
Local Emergency Planning Committee (North Little Rock LEPC)	(501) 340 5365 911 (for spills)
Local Emergency Planning Committee (Pulaski County LEPC)	(501) 340 6911 911 (for spills)
Local Water Supply	(501) 372 5161 (24 hr/day)
Weather Report	National Weather Service (501) 834 0308 (8 00 to 5 00)
Local Television/Radio Station for Evacuation Notice	KATV Channel 7 Little Rock AR (501)324 7777 KARK Channel 4 Little Rock AR (501)340-4444
Hospitals	Baptist Health Medical Center – Springhill Dr (501) 202 3000
Spill Response/Cleanup Contractors	TAS Environmental (888) 654 0111 Agricultural Services Inc (ASI) (24 hr) (800) 268-4790 or (501) 490 2468 Pollution Management Inc (PMI) (24 hrs) (501) 221 7122

APPENDIX B-2

SPILL CONTAINMENT AND CLEAN-UP EQUIPMENT

ARKANSAS TERMINALING & TRADING

SPILL CONTAINMENT AND CLEAN-UP EQUIPMENT

Last Inspection or Equipment Test Date _____
Inspection Frequency Quarterly
Last Deployment Drill Date NA
Deployment Frequency NA
Oil Spill Removal Organization Certification Yes copy included in this Appendix

1 SKIMMERS/PUMPS

Operational Status None
Type Model and Year _____
Number _____
Capacity in gallons/minute _____
Daily Effective Recovery Rate _____
Storage Location (building and location in building) _____
Date Fuel Last Changed _____

2 BOOMS

Operational Status None
Type Model and Year _____
Number _____
Size _____
Containment Area in square feet _____
Storage Location (building and location in building) _____

3 CHEMICALS STORED (Dispersants listed on EPA s NCP Product Schedule)

Type None
Amount _____
_____
Date Purchased _____
Treatment Capacity _____
_____
Storage Location (building and location in building) _____
_____

Were appropriate procedures used to receive approval for use of dispersants in accordance with the NCP (40 CFR 300 910) and the Area Contingency Plan (ACP) where applicable?_____(Y/N)

Name and State of On Scene Coordinator (OSC) authorizing use _____
Date Authorized _____

4 DISPERSANT DISPENSING EQUIPMENT

Operational Status None
Type and Year
Capacity
Storage Location (building and location in building)
Response Time in minutes

5 SORBENTS

Operational Status
Type and Year Purchased Various absorbent pads and booms
Amount
Absorption Capacity in gallons

Storage Location (building and location in building) Sorbents are located in the maintenance building (old truck maintenance shop) Fill dirt (for diking) is located east of the berm crossing on the southern berm

6 HAND TOOLS

Operational Status
Type and Year Various shovels and rakes
Quantity

Storage Location (building and location in building) Maintenance building (old truck maintenance shop)

7 COMMUNICATION EQUIPMENT

Operational Status
Type and Year (include operating frequency and channel and/or cellular phone numbers)
Kenwood Two Way Radios
Quantity
Storage Location (building and location in building) Terminal Office

8 **FIRE FIGHTING AND PERSONNEL PROTECTIVE EQUIPMENT**

Operational Status Good – Inspected semi annually by outside contractors
Type and Year Twenty four 20 lbs dry chemical, hand held fire extinguishers
Three 150 lbs dry chemical wheel mounted fire extinguishers
Various gloves, hardhats, safety glasses, domestic 3/4 water hoses
Quantity See Above
Storage Location (building and location in building) Throughout the facility Conspicuously Located
Wheel mounted fire extinguisher located at each loading rack

9 **OTHER** (e g heavy equipment boats and motors)

Operational Status
Type and Year Ford Model TC 35 front end loader / 2004

Quantity One
Storage Location (building and location in building) Maintenance shop (old truck shop)

APPENDIX B-3

GENERAL CONTRACTOR AND SERVICE AGREEMENT
CONTRACTOR LIST

ARKANSAS TERMINALING & TRADING

GENERAL CONTRACTOR LIST

CONTRACTOR	PHONE	SERVICE
TAS Environmental	(888) 654 0111	Spill Response Contractor
Pollution Management Inc (PMI)	(501) 221 7122	Environmental Consulting
Agricultural Services Inc (ASI)	(800) 268-4790 (501) 490 2468	Spill Response Contractor/Vac Truck Temporary Storage/Disposal
BFI Waste Systems	(501) 568 1645	Disposal

Appropriate contract/service agreements follow this page

APPENDIX C

SPILL RESPONSE NOTIFICATION FORM

TAC ARKANSAS TERMINALING & TRADING

SPILL RESPONSE NOTIFICATION FORM

Reporter s Last Name _____ First _____ M I _____
Reporter s Daytime Evening & Home Phone Numbers ( )___ _____ ( )___ _____
Reporter s Company _____ ( )___ _____
Reporter s Department/Section _____
Reporter s Position _____
Owner s Address _____
Owner s City State and Zip _____

Were Materials Released _____ (Y/N)?
Confidential _____ (Y/N)?
Meeting Federal Obligations to Report _____ (Y/N)?
Call Made to National Response Center _____ (Y/N)?
Date _____ Time _____
Calling for Responsible Party _____ (Y/N)?

INCIDENT DESCRIPTION

Source and Cause of Incident _____
_____
_____
_____

Date of Incident _____ Time of Incident _____
Incident Address/Location _____
_____
Facility Latitude (degrees minutes and seconds) _____
Facility Longitude (degrees minutes and seconds) _____
Nearest City (also list the County State and Zip) _____
_____
Distance from the Nearest City (give units) _____
Direction from the Nearest City _____
Container Type _____
Tank Capacity (include units) _____
Facility Capacity (include units) _____

MATERIAL

CHRIS Code _____
Released Quantity (with units) _____
Material Released in Water? If so quantity (include units) _____

SPILL RESPONSE NOTIFICATION FORM
(Continued)

RESPONSE ACTION

Actions Taken to Correct Control or Mitigate Incident _____
_____
_____
_____

IMPACT

Number of Injuries _____
Number of Deaths _____
Were there Evacuations _____ (Y/N)? If Yes the number of people evacuated _____
Was there any damage _____ (Y/N)? If Yes describe the damage including the medium affected and the approximate dollar amount of damage (Be complete) _____
_____
_____
_____
_____
_____

ADDITIONAL INFORMATION

Any information about the incident not recorded elsewhere in the report? _____
_____
_____
_____
_____

CALLER NOTIFICATIONS

EPA _____ (Y/N)? State _____ (Y/N)?
USCG _____ (Y/N)? Other _____ (Y/N)?

Describe _____

APPENDIX D

SPILL POTENTIAL ANALYSIS

TAC ARKANSAS TERMINALING & TRADING

SPILL POTENTIAL ANALYSIS

ASSUMPTIONS

An initial spill potential of 0 1 is assigned to the facility

Daily site inspections for leaks are used as a measure to decrease spill potential Thus standard operational procedures will result in a reduction in spill potential of 0 10

There have been two (2) known reportable small quantity spills at this facility However based upon site visits the site displayed no signs of minor spillage The following scoring will be used

Reportable spills	0 10 per spill
Valve leaks	up to 0 10
Tank seam leaks	up to 0 10
Signs of other spills (stressed/dead vegetation pipe joints bldg connections)	up to 0 10

The following scale was used to estimate spill potential due to age of storage tanks

Riveted tank	0 20
Over 75 years old	0 30
50 75 years old	0 20 0 30
35 50 years old	0 10 0 20
20 35 years old	0 05 0 10
Less than 20 years old	0 05

All tanks are bermed with adequate size and construction of the berms Therefore horizontal range of spill is limited Probability of +0 05

This site is above the 100 year floodplain however it is in a tornado zone Vulnerability to natural disasters will increase probability by 0 05

ARKANSAS TERMINALING & TRADING

SPILL POTENTIAL ANALYSIS

ANALYSIS

Condition	Probability	
Initial Probability of Spill		+0 10
Standard Operating Procedures	0 10	
Spill History		
Reportable Spills (none)	0 0	
Valve Leaks (none observed)	0 0	
Seam Leaks (none observed)	0 0	
Stressed Vegetation (none observed)	0 0	
Tank Age (Four tanks are 25 years old)		+0 06
Horizontal Range		+0 05
Vulnerability to Natural Disasters (tornado zone)		+0 05
Total Spill Potential	**+0 16**	

APPENDIX E

WORST CASE DISCHARGE CALCULATION WORK SHEET

TAC ARKANSAS TERMINALING & TRADING

Determination of Worst Case Discharge
(40 CFR Part 112, Appendix D)

A worst case discharge calculation work sheet has been developed for the TAC Arkansas Terminaling & Trading facility The calculation work sheet follows the example provided in 40 CFR part 112 Appendix D

Part A Worst Case Discharge Calculation for Onshore Storage Facilities

Part A of this worksheet is to be completed by owner or operator of an SPCC regulated facilities (excluding oil production facilities) if the facility meets the criteria as presented in Appendix C to 40 CFR 112 or if it is determined by the EPA Regional Administration that the facility could cause substantial harm to the environment

A 1 Single Tank Facilities

For facilities containing only one above ground oil storage tank the worst case discharge planning volume equals the capacity of the oil storage tank If adequate secondary containment (sufficiently large to contain the capacity of the aboveground oil storage tank plus sufficient freeboard to allow for precipitation) exists for the oil storage tank multiply the capacity of the tank by 0 8

(1) Final Worst Case Volume N/A Gal – Not a single tank facility
(2) Do not proceed further

A2 Secondary Containment – Multiple Tank Facilities

Are all aboveground oil storage tanks or groups of aboveground oil storage tanks at the facility without adequate secondary containment?

No (Y/N)

A 2 1 If the answer is yes the final worst case discharge planning volume equals the total aboveground oil storage capacity at the facility

Final Worst Case Volume N/A Gal
Do not proceed further

A 2 2 If the answer is no calculate the total aboveground oil storage capacity of tanks without adequate secondary containment If all aboveground oil storage tanks or groups of aboveground oil storage tanks at the facility have adequate secondary containment ENTER 0" (zero)

0 Gal

A 2 3 Calculate the capacity of the largest single aboveground oil storage tank within an adequate secondary containment area or the combined capacity of a group of aboveground oil storage tanks permanently manifolded together whichever is greater PLUS THE VOLUME FROM QUESTION A 2 2

Final Worst Case Volume 3,365,040 Gal

Part B Worst Case Discharge Calculation for Onshore Production Facilities

NOT APPLICABLE

APPENDIX F

PLANNING DISTANCE CALCULATION

ARKANSAS TERMINALING & TRADING

PLANNING DISTANCE CALCULATION

A catastrophic oil discharge from the TAC Arkansas Terminaling & Trading facility would most likely be intercepted by a marsh (Stark Bend) located immediately west of the facility Upon entering Stark Bend the oil would most likely spread over the surface of the still water

CALCULATIONS

The specified time interval for arrival of response resources was based on those contained in 40 CFR Part 112 Attachment C III Table 3 and was determined to be 27 hours

Calculation of the planning distance consisted of two segments

Segment 1 250 lineal feet of flow across a grass field to Stark Bend

$t = D/v$

Using the overland sheet flow SCS equation

$v = aS^{1/2}$

Where a = coefficient of 2 5 for meadow
S = slope

Results v = 0 387 ft/sec
S = 0 024 ft/ft
t = 250 ft/0 387 ft/sec = 645 sec ≈ 0 2 hours

Segment 2 Still water flow within Stark Bend

$t = D/v$

For still water the distance of oil migration is derived from the area formula provided in 112 appendix C section 3 0 for semi circular spreading

$A = \frac{1}{2} (\pi r^2) = 10^5 \times V' \times C$

Where V = volume of discharge in gallons
C = conversion factor = 0 1643

Results
V = 3 365 040 gallons
r = 28 658 ft or 5 4 miles

Estimate the distance of travel in 26 8 hours

Assumptions
20 knot wind under storm conditions
An oil slick moves at 3% of the wind speed

v = 20 knot x (1 15 miles/hour/knot) x 0 03 = 0 69 mph

26 8 hours x 0 69 mph = 18 5 miles

The total distance oil will travel including distance due to spreading

d = 18 5 miles + 5 4 miles = 23 9

PLANNING DISTANCE = 24 MILES

APPENDIX G

EXAMPLES OF INSPECTION CHECKLISTS

EXAMPLE OF ANNUAL INSPECTION LOGS

A comprehensive inspection will be made of the facility on an annual basis The inspection will cover potential sources of pollution (tanks and piping) structural controls and spill containment and clean up equipment The results of this inspection will be documented on the following logs

ARKANSAS TERMINALING & TRADING

OPERATOR INSPECTION & DUTY LOG

Duty	Frequency	Shift	Initials
Terminal Inspection Tanks & Piping (and pipe supports) Valves (glands and body) & Locks Flanges (all joints) Pumps (including seals) Oil/Water Separators Flare Dike Integrity Varec Gauges (equalize as needed) Waste Water Holding Tanks Catch Basins Metal Surfaces	Daily	All	
Make Rack Repairs	As Needed	All	
Mow Grass and Weed Eat	As Needed	1st	
Drain Dike Water	As Needed	1st & Wknd 1st	
Grease Valves Arms etc	As Needed	1st	
Pipeline Receipts/Ethanol Receipts/Samples	As Needed	All	
Additive Receipts	As Needed	1st & 2nd	
Jet Fuel Test Quick Flush T6 & T7 Sump Filters	Daily	1st	
Transfer Jet Fuel	As Needed	2nd & 3rd	
Test Gravity for Each Product/Update Computer	As Needed	1st	
Check Lights	Nightly	2nd & 3rd	
Clean Office	Daily	All	
Empty Trash Cans/Police Trash	As Needed	All	
Pressure Wash Racks	As Needed	All	
Clean Rack Drains	As Needed	All	
Gauge Tanks (handline)	Weekly	1st	
Drain Tanks Bottom Waters / Storm Tanks	Tks 1 2 3 4,5 8 9 11	1st (Circle)	
Sulfur/Flash Tests on Tanks 1 4 & 9	Upon Receipt	1st	
WISM Test	As Needed	1st	
Clean South Bathroom	Daily	2nd	
Drain VCU	As Needed	1st	

If maintenance is required note it here

_____

_____

_____

_____

Supervisor Signature _____

Last Revision May 2009

DIKE DRAIN LOG

INSPECTION PROCEDURE Dike drain valves are to be kept closed except when draining operations are in progress Dike drain valves are not to be opened while a product receipt is in progress Dike drain valves are not to be left open when the terminal is unattended During prolonged draining, the outflow will be checked periodically Containment dikes are inspected after major storm events in order to insure their integrity All stormwater contained onsite is examined daily for the presence of fuel If fuel is observed, it is removed with an absorbent All valves are inspected daily to ensure that they are not leaking The drainage ditch is visually inspected daily during discharge events for evidence of fuel sheen or stains During discharge events, effluent samples are taken per TCEQ facility discharge permit

DIKE DRAIN & INSPECTION LOG

Date	Open Time Visible Sheen – Y/N Signature	Inspection 1 Visible Sheen – Y/N Time, Initial	Inspection 2 Visible Sheen – Y/N Time, Initial	Did You Close Y/N Time, Initial	Person Who Closed Signature

Facility Arkansas Terminaling & Trading
Name of Operator Truman Arnold Companies
Revision Date September 2008

QUARTERLY TANK INSPECTION

TANK 1

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 2

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 3

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 4

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 5

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 6

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 7

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 8

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 9

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 10

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

Last Revision August 2008

QUARTERLY TANK INSPECTION

TANK 11

Date _____ **Inspector** _____

	√ for OK x for Finding	Comments
Check Tank For Leaks		
Drip Marks		
Discoloration of tank		
Puddles of spilled material		
Corrosion		
Cracks		
Dead vegetation		
Check Foundation		
Cracks		
Discoloration		
Puddles of spilled material		
Settling		
Gaps between tank & foundation		
Damage by vegetation roots		
Check Piping For		
Droplets of stored material		
Discoloration		
Corrosion		
Bowing between pipe supports		
Leaks from valves or seals		
Dead vegetation		

Note Any Findings/Comments

_____

_____

_____

Supervisors Signature_____

SECONDARY CONTAINMENT INSPECTION

North Dike

Date _____ **Inspector** _____

	√if OK X if Finding	Comments
Dike or Berm System		
Water in dike		
Operational status of drainage valves		
Dike or berm permeability		
Debris		
Erosion		
Permeability of earthen floor of dike		
Secondary Containment		
Cracks		
Discoloration		
Presence of spilled or leaked material		
Corrosion		
Valve condition		
Retention and Drainage Ponds		
Erosion		
Available capacity		
Presence of spilled or leaked material		
Debris		
Stress vegetation		

Note any Findings/Comments

_____

_____

_____

_____

_____

_____

Supervisor Signature _____

Last Revision August 2009

SECONDARY CONTAINMENT INSPECTION

South Dike

Date _____ **Inspector** _____

	√if OK X if Finding	Comments
Dike or Berm System		
Water in dike		
Operational status of drainage valves		
Dike or berm permeability		
Debris		
Erosion		
Permeability of earthen floor of dike		
Secondary Containment		
Cracks		
Discoloration		
Presence of spilled or leaked material		
Corrosion		
Valve condition		
Retention and Drainage Ponds		
Erosion		
Available capacity		
Presence of spilled or leaked material		
Debris		
Stress vegetation		

Note any Findings/Comments

_____

_____

_____

_____

_____

_____

Supervisor Signature _____

Last Revision August 2009

RESPONSE EQUIPMENT INSPECTIONS

Inspection Frequency Quarterly

	1st QTR	2nd QTR	3rd QTR	4th QTR
Inspected By Date				
24 X 24 absorbent pads Five Bundles				
8-inch absorbent boom Three Bundles				
4 inch absorbent boom - Two Bundles				
Shovels - 5				
Rakes 2				
Two-Way Radios 4				
Ford Tractor Model TC-35				
Dirt – Pile 1 at Pipe Bridge				
Dirt – Pile 2 at Biodiesel Off-load				

Remarks

_____

_____

_____

_____

RESPONSE EQUIPMENT INSPECTIONS

Date of Last Inspection	Inspection Frequency	Last Deployment Drill Date	Deployment Frequency	OSRO Certification
	Qtrly			

SKIMMERS/PUMPS – No Facility Owned Skimmers/Pumps

Operational Status
Model and Year
Number
Capacity in gallons/minute **NA**
Daily Effective Recovery Rate
Storage Location (building and location in building)
Date Fuel Last Changed

BOOMS – No Facility Owned Water Boom

Operational Status
Type Model and Year
Number **NA**
Size
Containment Area in square feet
Storage Location (building and location in building)

CHEMICALS STORED (Dispersants) – No Facility Owned Chemicals

Type
Amount
Date Purchased **NA**
Treatment Capacity
Storage Location (building and location in building)
Has the facility applied for a permit to use the above listed dispersants?
State ____ (Y/N) Federal ____ (Y/N)
Name and State of On Scene Coordinator (OSC) Authorizing use
Date Authorized

DISPERSANT DISPENSING EQUIPMENT – No Facility Owned Dispersant Equipment

Operational Status
Type and Year
Capacity **NA**
Storage Location (building and location in building)
Response Time in minutes

ABSORBENTS

Operational Status

Type and Year Purchased

Amount

PLACE ORDER FOR

Absorption Capacity in gallons **N/A**

Storage Location (building and location in building) **Maintenance Building (old truck shop)**

At a minimum, inventory should be maintained at the following quantities
Three Bags 8-inch absorbent boom
Two Bags 4-inch absorbent boom
Five Bundles 24"x 24" absorbent pads

HAND TOOLS

Operational Status

Type and Year **N/A**

Quantity

Storage Location **Maintenance Building (old truck shop)**

At a minimum, inventory should be maintained at the following quantities
Hand Shovels Five (5)

COMMUNICATION EQUIPMENT

Operational Status

Type and Year (include operating frequency and channel and/or cellular phone numbers)

Quantity

Storage Location (building and location in building) **Terminal Office**

At a minimum, inventory should be maintained at the following quantities
F Motorola XV 2100 two-way radios

FIRE FIGHTING AND PERSONNEL PROTECTIVE EQUIPMENT

Operational Status **Good, inspected semi-annually by extinguisher company**

Type and Year Dry Chemical

Quantity **3 – 350 lb – wheeled**
24 – 20 lb

Storage Location (building and location in building)
Throughout Facility, 350-lb extinguishers located at each loading rack

At a minimum, inventory should be maintained at the following quantities
3 350 lb dry chemical (purple K) fire extinguishers
24- 20 lb dry chemical fire extinguishers

OTHER (e g heavy equipment boats and motors)

Operational Status

Type and Year 2004 – Ford Model TC 35 front end loader

Quantity One

Storage Location (building and location in building) Maintenance Shop (old truck shop)

APPENDIX H

EXAMPLE OF DRILL/EXERCISE LOGS

Triennial CYLCLE Documentation FORM

	2010				2011				2012				Core Components													
	CY				CY				CY																	
	Quarters				Quarters				Quarters																	
	1	2	3	4	5	6	7	8	9	10	11	12	Notification	Staff Mobilization	Operate in IRMS	Discharge Contained	Assessment	Containment	Recovery	Protection	Disposal	Communications	Transportation	Personnel Support	Equipment Maint	Procurement	Documentation
QI Notification																										
Emergency Procedures																										
SMT Tabletop																										
Equipment Deployment																										
OSRO/HSRO Equipment Deployment																										
Gov t initiated Unannounced																										
Area Exercise																										

For each quarter in which an excise was completed, mark that with an ' X" then mark each core component tested during an exercise

Internal Exercise Documentation Form

Qualified Individual Notification Form

- **Date performed**

- **Exercise or actual response?**

- **Facility initiating exercise**

- **Name of person notified**

  Is this person identified in your response plan as QI or designee?

- **Time initiated**

  Time QI or designee responded

- **Method of contact** **Office Phone**
  Cell Phone
  Home Phone
  Other, explain

- **Description of notification procedure**

- **Identify which of the 15 core components of your response plan were exercised during the particular exercise**

___ Notification	___ Staff Mobilization	___ Operate in RMS	___ Discharge Contained
___ Assessment	___ Containment	___ Recovery	___ Protection
___ Disposal	___ Communications	___ Transportation	___ Personnel Support
___ Equip Maint	___ Procurement	___ Documentation	

Certifying Signature_____

Internal Exercise Documentation Form

Spill Management Team Tabletop Exercise

- **Date performed**
- **Exercise or actual response?** **If exercise, announced or unannounced?**
- **Location of tabletop**
- **Time started**

  Time completed
- **Response plan scenario used (check one)**
  - ____ Average most probable discharge
  - ____ Maximum most probable discharge
  - ____ Worse Case Discharge
  - ____ Size of spill (bbls/gallons)
- **Describe how the following objectives were exercised**

  a) **Spill management teams knowledge of oil-spill response plan**

  b) **Proper notification**

  c) **Communication system**

  d) **Spill management team's ability to access contracted oil spill removal organizations**

  e) **Spill management team's ability to coordinate spill response with On-Scene Coordinator, state and applicable agencies**

- **Identify which of the 15 core components of your response plan were exercised during the particular exercise**

___ Notification	___ Staff Mobilization	___ Operate in RMS	___ Discharge Contained
___ Assessment	___ Containment	___ Recovery	___ Protection
___ Disposal	___ Communications	___ Transportation	___ Personnel Support
___ Equip Maint	___ Procurement	___ Documentation	

- **Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures**

Certifying Signature_____

Internal Exercise Documentation Form

Emergency Procedures Exercise

- **Date performed**

- **Exercise or actual response?** **If an exercise, announced or unannconced?**

- **Facility name**

- **Time started**

  Time completed

- **Sections of facility emergency procedures exercised (i e response to contained spill, response to uncontained spill, response to fire, etc)?**

- **Description of exercise**

- **Identify which of the 15 core components of your response plan were exercised during the particular exercise**

___ Notification	___ Staff Mobilization	___ Operate in RMS	___ Discharge Contained
___ Assessment	___ Containment	___ Recovery	___ Protection
___ Disposal	___ Communications	___ Transportation	___ Personnel Support
___ Equip Maint	___ Procurement	___ Documentation	

- **Description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures Use back of page if additional space is needed**

Certifying Signature_____

Internal Exercise Documentation Form

Equipment Deployment Exercise

- **Date performed**

- **Exercise or actual response?** **If exercise, announced or unannounced?**

- **Deployment location(s) Arkansas Terminaling & Trading**

- **Time started**
  - **Time OSRO called**
  - **Time on-scene**
  - **Time boom deployed**
  - **Time recovery equipment arrives on-scene**

  Time completed

- **Equipment deployed was ____Facility owned**
  ____OSRO owned, Name of OSRO TAS Environmental

- **List type and amount of all equipment (e g boom and skimmers) deployed and number of support personnel employed**

- **Describe goals of the equipment deployment**

- **For deployment of facility-owned equipment ,was the amount of equipment deployed at least the amount necessary to respond to your facility's average most probable spill?**

  Was the equipment deployed in its intended operating environment?

- **For deployment of OSRO-owned equipment, was a representative sample (at least 100 feet of each boom type and at least one of each skimmer type) deployed?**

  Was equipment deployed in its intended operating environment?

- **Are all facility personnel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program?**

If so, describe the program

Date of last equipment inspection

- **Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill?**

- **Was all deployed equipment operational? If not, why?**

- **Identify which of the 15 core components of your response plan were exercised during the particular exercise**

___ Notification	___ Staff Mobilization	___ Operate in RMS	___ Discharge Contained
___ Assessment	___ Containment	___ Recovery	___ Protection
___ Disposal	___ Communications	___ Transportation	___ Personnel Support
___ Equip Maint	___ Procurement	___ Documentation	

- **Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures**

Certifying Signature_____ **Record Retention 5 Years**

APPENDIX I

RESPONSE TRAINING

TRAINING LOG
Safety/SPCC/FRP

Course Date	Course Subject(s)

Program Leader		
Employee #	Name	Employee
		Yes No

Attendees		
	Employee #	Name
1		
2		
3		
4		
5		
6		
7		
8		

Additional Comments

1 1 8 Immediate Actions

Ideally the Terminal Manager will be the first to arrive at a reported emergency site However any employee may be designated to proceed immediately to the emergency location The first person that arrives onsite should

1 Scan the site to evaluate what occurred

2 If necessary evacuate people in the area

3 Isolate and eliminate all open sources of ignition and

4 Contact the Environmental Manager and Terminal Manager and inform them of the situation

Immediate steps to be taken to control the spill are

1 Cut off the flow of oil
   a) Switch flow to other tankage if available and/or
   b) Shut down lines

2 Check to be sure dike drains are closed and holding

3 Notify police and fire department of spill and request assistance if necessary Have possible ignition sources shut off and control traffic to keep vehicles out of vapor area

4 Arrange for vacuum trucks to pick up product (if applicable)

If there is a fire or explosion near the facility immediate steps include

1 Notify the nearest fire department

2 Determine if the facility will be endangered by fire

3 Advise fire fighters of hazardous materials stored in tankage and assist them in keeping flames away from facility

Following immediate actions to cut off the flow of oil and assess the impact of the spill measures to contain and clean up the oil should be implemented if they can be done so safely Procedures for containment and clean up are outlined in detail in Section 1 7 of this plan

1 1 9 Facility Diagrams

Facility diagrams including a site location map a site plan diagram a site drainage plan diagram site evacuation plan diagram and a facility tank/piping schematic diagram are presented as Figures 9 1 9 2 9 3 9-4 and 9 5A/9 5B respectively in Section 1 9

1 2 FACILITY INFORMATION

General information as required by 40 CFR §112 20(h)(2) has been summarized below

1 2 1	**Facility Name**	Arkansas Terminaling & Trading (AT&T)
	Facility Street Address	2207 Central Airport Road
	City	North Little Rock
	State	Arkansas
	Zip Code	72117
	County	Pulaski
	Phone Number	(501) 945-4681
1 2 2	**Latitude**	34° 46 18 80 N
	Longitude	92° 10 41 89 W
1 2 3	**Well Head Protection Area**	No
1 2 4	**Owner**	Truman Arnold Companies
	Owner Address	701 South Robison Road
	City	Texarkana
	State	Texas
	Zip Code	75501
	County	Bowie
	Phone Number	(903) 794 3835
1 2 5	**Qualified Individual**	Rick Shingleur
	Position	Corporate Environmental Manager
	Work Address	701 South Robison Road Texarkana Texas 75501
	Home Address	(b) (6)
	Emergency Phone Numbers	
	Work	(903) 794 3835
	Home	(b) (6)
	Cell	(b) (6)
	QI Training	40 hr HAZWOPER, specific knowledge of the contents and requirements for implementation of this FRP specific knowledge of facility operation
1 2 6	**Date of Oil Storage Start Up**	1980
1 2 7	**Current Operation**	NAICS 42271 (SIC 5171) Bulk Petroleum Storage and Distribution

1 2 8 **Dates and Types of Substantial Expansion** This facility was originally construction in 1980 The original construction included one 1 111 908 gallon and one 1 899 072 gallon aboveground diesel storage tanks one 1 996 050 gallon and one 1 997 016 gallon aboveground gasoline storage tanks (Tanks 1 through 4) a vapor recovery system and flare and a two lane bi directional truck loading rack The facility was modified in 1985 to include an additional 1 799 532 gallon aboveground gasoline storage tank (Tank 5) In 1995 storage capacity was increased with the addition of a 1 799 532 gallon and one 402 360 gallon Jet A aboveground storage tanks (Tanks 6 and 7) The truck loading rack was expanded from two bi directional lanes to three uni directional lanes in 1998 In 2004 the facility increased it storage capacity

with the construction of one 3 147 228 gallon and one 3 155 040 gallon aboveground storage tanks (Tanks 8 and 9) one for diesel storage and one for gasoline storage and added a second truck loading rack with two uni directional lanes In 2006 two 20 000 gallon biodiesel (B 100) tanks (Tanks 18 and 19) were put into service In 2008 three 20 000 gallon ethanol tanks (Tanks 20 21 and 22) one 2 100 000 gallon ethanol tank (Tank 10) an additional lane for loading and unloading ethanol via cargo truck and a five railcar ethanol off loading station were constructed and put into service In 2009 a new two lane uni directional loading rack located near the southeast corner of the property and a new 3 360 000 gallon aboveground gasoline storage tank (Tank 11) was constructed and put into service

Date of Last Update **November 2009**